

## Submission to the Food Labelling Law and Policy Review

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## 1. Executive Summary

Labelling of alcoholic beverages in Australia is currently insufficient if the main objective of labelling is to assist consumers in making informed, healthy and responsible choices about their alcoholic beverage intake. Under the *Food Standards Code*, alcoholic beverages are currently exempted from displaying ingredients and nutrition information, which ADCA considers unacceptable.

ADCA further believes that there is potential to enhance the display of standard drink and alcohol content information. Currently, the *Food Standards Code* mandates that standard drink information is displayed in the wording “Contains approximately XX standard drinks”. However, consideration should be given to substitute the wording with a mandatory standard drink logo to maximise legibility and accessibility of the information.

Questions around treating alcohol products as food, their exemption from the mandatory nutrition information panels and the requirements to list ingredients, and standardisation of labelling in relation to standard drink information and alcohol content, health advisory information labels, and nutrition information labels will have to be addressed in order to improve Australians’ knowledge about health impacts, ingredients and nutrition information of alcoholic beverages, enabling them to make informed choices. ADCA argues that the following recommendations should receive serious consideration.

### **ADCA recommends:**

- **that alcohol products continue to be regulated under the *Food Standards Code***

Alcoholic products should continue to be regulated as food products under the *Food Standards Code* due to their potential to contain significant amount of calories.

- **That exemptions for alcohol products under the *Food Standards Code* be removed**

ADCA recommends that the exemption for alcoholic products under the *Food Standards Code* to disclose ingredients and nutritional information is being revoked. In fact, the display of ingredients and nutrition information on alcoholic beverage packaging should be made mandatory to ensure that consumers make informed choices about their alcohol consumption. More education should occur and community awareness be raised about sugar and calories content of alcoholic beverages as this may contribute to young people regulating their alcohol intake.

- **That standard drink and alcohol content information in logo format be standardised and mandated**

Graphical standard drink information logos should be made mandatory and fully replace the standard drinks message “Contains approximately XX standard drinks”. The standard drink logo should be standardised across beverage classes. Binding guidelines should be developed which standardise format, font, and colours of the logo, as well as its particular place on the container to maximise legibility. Consideration should be given to the

suggestion to include as part of the standard drink logo a definition of the millilitre amount which constitutes a standard drink of the specific beverage, e.g. 1 SD = 30ml. More community education should be conducted in relation to standard drink definitions for different alcoholic beverages and the Australian Alcohol Guidelines by the National Health and Medical Research Council. Further, qualitative community/ industry/ AOD sector market testing should be incorporated as an integral part of the development of a standard drinks logo which is considered informative by the general public prior to it being mandated and implemented.

- **That mandatory health advisory information labels should be introduced**

The display of health information labels should be mandated on all alcoholic beverage packaging to enable consumers to make informed choices about their alcohol intake. Health advisory information labels should be graphic and attention-getting, occupy a considerable proportion of the package surface, and involve rotating messages. Health advisory information labels should target the general population, rather than attempting to direct specific messages to specific groups. The introduction and implementation of mandatory health warning labels in Australia should be closely monitored and evaluated from the outset.

## **2. Introduction**

Alcohol is the most widely used drug in Australia (AIHW 2008). Next to tobacco, excessive alcohol consumption is a major risk factor for morbidity and mortality, and has been associated with diseases such as cancer, stroke and heart attack, and cirrhosis of the liver, and injuries in many settings, including motor vehicle and bicycle accidents, incidents involving pedestrians, falls, fires, drowning, sports and recreational injuries, overdose, assault, violence, and intentional self-harm (NHMRC 2009; Chikritzhs et al 2003). It has been estimated that harm from alcohol was responsible for 3.2% of the total burden of disease and injury in Australia in 2003 (Begg et al. 2007), and for 2004-2005, the total social cost of alcohol abuse was estimated at \$15.3 billion (Collins & Lapsley 2008).

Current alcohol consumption levels in Australia are high by world standards (WHO 2008), with patterns of high risk drinking among young people and in some Indigenous communities being of particular concern. Research shows that occasional or weekend excessive drinking poses the greatest risk in relation to alcohol-related violence, accidents, and injury, thus contributing exponentially to the overall social costs of alcohol misuse in Australia.

Given the prominent role alcohol often plays in Australian society and the fact that alcohol-related harm has been the subject of much discussion at all political levels and in the communities, ADCA considers it timely that a number of additional aspects of alcoholic products are being discussed in the context of the Food Labelling Law and Policy Review. ADCA welcomes the Review and believes that addressing issues around health advisory information labels, standard drink information and display of ingredients and nutrition information on the packaging of

alcoholic products provides another opportunity to address alcohol-related harm in our society. ADCA believes that more needs to be done to inform consumers at the point of purchase about the impact that alcohol consumption can have on their health and well-being. ADCA believes that consumers need to be enabled to make informed choices about their alcohol intake, and that information on ingredients, standard drinks, health impacts, and calorific content of alcoholic beverages is currently either non-existing or insufficient. The packaging labels of alcoholic beverages can be utilised in more effective ways to display this important information, as will be outlined in this submission.

ADCA's submission will solely focus on labelling of alcoholic beverages as addressed under agenda item 3.17 in the Review's Issues Consultation paper. It will address questions around treating alcohol products as food, their exemption from the mandatory nutrition information panels and the requirements to list ingredients, and standardisation of labelling in relation to standard drink information and alcohol content, health advisory information labels, and nutrition information labels.

### **3. ADCA and the AOD sector**

The Alcohol and other Drugs Council of Australia (ADCA) is the national peak body for the alcohol and other drugs (AOD) sector, providing an independent voice for people working to reduce the harm caused by alcohol and other drugs.

ADCA is a non-government, not-for-profit organisation which receives approximately 80% of its core funding and major ongoing project funding through the Australian Government Department of Health and Ageing under its Community Sector Support Scheme (CSSS), and the National Drug Strategy Program respectively. Approximately 12% is received through other project grants from State Governments. The remaining 8% is generated through ADCA's membership fees, interest and other sources of income (small one-off projects).

As the national peak body, ADCA occupies a key role in advocating for adequate infrastructure support and funding for the delivery of evidence-based alcohol and other drug (AOD) initiatives.

Under the new governance arrangements, the ADCA Board is elected by the ADCA membership and consists of a total of nine Board Directors. The ADCA Federal Council comprising one representative per State/ Territory peak plus the ADCA Board, has been established as a key mechanism for coordination and cooperation with State/ Territory peaks. The ADCA Policy Forum comprises the ADCA Board, the State/Territory AOD peaks, and the Chairs of the ADCA Working Groups, and establishes an advisory forum on key policy issues for the AOD sector.

At 1 May 2010, ADCA's membership totalled 357, comprising 161 organisational members, 50 associate organisational members, 135 individual members, and eleven life members. These include AOD services, agencies, and individual professionals and practitioners engaged in AOD services throughout Australia, as well as major university research centres, tertiary institutions offering courses in addiction studies and other programs for alcohol and other drugs workers, officers of law enforcement and criminal justice systems, policy analysts, and administration.

ADCA's strategic communication, policy, and advocacy on key issues is developed in close liaison with its broad and diverse membership base across all jurisdictions, the State and Territory peak bodies, as well as other AOD and non-government organisation (NGO) stakeholders.

#### **4. Labelling of alcohol beverages**

Labelling of alcoholic beverages is currently insufficient if the main objective of labelling is to assist consumers in making informed, healthy and responsible choices about their alcoholic beverage intake. Under the *Food Standards Code*, alcoholic beverages are currently exempted from displaying ingredients and nutrition information, which ADCA considers unacceptable, as outlined in greater detail below.

ADCA further believes that there is potential to enhance the display of standard drink and alcohol content information. Currently, the *Food Standards Code* mandates that standard drink information is displayed in the wording "Contains approximately XX standard drinks". However, consideration should be given to substitute the wording with a mandatory standard drink logo to maximise legibility and accessibility of the information. Standardisation of and design guidelines for a standard drink logo will be discussed in section 4.3.

ADCA would like to draw the Review Panel's attention to the fact that some of the issues considered within this Review were also discussed in previous ADCA submissions:

- Submission to Food Standards Australia and New Zealand: Application A576 – Labelling of alcoholic beverages with a pregnancy health advisory label
- Submission to the Senate Inquiry for Alcohol Toll Reduction Bill
- Submission to the National Preventative Health Taskforce

##### **4.1 Regulation of alcohol products under the *Food Standards Code***

At present, alcohol is regulated as a food product and falls under the authority of Food Standards Australia and New Zealand (FSANZ). While Standard 2.7.1, Clause 3 of the *Food Standards Code* requires that alcoholic beverages are labeled with information on their alcohol content level, the packaging of alcoholic beverages, unlike that of other beverages, is not required to display a list of ingredients or nutrition information. According to Wilkinson and Room (2009), "this exemption is hard to justify" and will be addressed in greater detail in the next section.

There has been some controversy around the question whether alcohol should be regulated under the *Food Standards Code* to begin with, given its special nature as a food product and a drug and the special treatment it receives within the code as alcoholic beverages are exempted from nutrition information requirements, as per Standard 1.2.8 of the Code.

Alcohol is a liquid produced by fermentation, which is the action of yeast on liquids containing sugars and starches. Pure alcohol has no colour or smell, and alcoholic drinks vary in colour and taste because of other ingredients that are added to them

(ADF 2009). Alcohol is a psychoactive drug as it affects mood, perception or consciousness as a result of changes in the functioning of the nervous system. Within the four subdivisions of psychoactive drugs – depressants, tranquillisers, hallucinogens, and stimulants – alcohol belongs into the first group.

Alcohol is a depressant drug and slows down activity in the central nervous system, which means it slows down the messages going between the brain and the body. Depressant drugs affect concentration and coordination, and slow the person's response time to unexpected situations. In small quantities, depressants such as alcohol cause people to become relaxed and lower their inhibitions. They feel more confident and often act in a more extroverted manner. In larger quantities, however, depressants can cause unconsciousness and even death (ADF 2009).

Like any non-alcoholic drink or food, alcoholic drinks contain calories. One gram of alcohol contains seven calories, second only to fat (nine calories per one gram) in energy concentration. A “standard” alcoholic drink or unit contains ten grams of alcohol, which equals 70 calories from the alcohol alone, leaving additional sugars aside ([www.alcohol.gov.au](http://www.alcohol.gov.au)). For example, two standard drinks of sweet white wine (equals 200ml) have approximately 190 calories, roughly the same amount contained in a plain donut.

Some people have argued that alcohol, like tobacco, another legal drug, should not be regulated under the Foods Standards Code. Such argumentation, however, does not take into account the fact that alcoholic beverages, unlike cigarettes, can contain significant amounts of sugar and thus calories.

Against this background, ADCA believes it is imperative that alcoholic beverages are regulated as food products without being exempted from displaying ingredients and nutrition information on their packaging.

**Recommendations:**

1. Alcoholic products continue to be regulated as food products under the *Food Standards Code* due to their potential to contain significant amount of calories.

**4.2 Removal of exemptions for alcohol products under the *Food Standards Code***

Under Standard 1.2.4, Clause 2b of the *Food Standards Code*, alcoholic beverages are excluded from listing the ingredients contained in each package. Under Standard 1.2.8, Clause 3b of the *Food Standards Code*, alcoholic beverages are excluded from providing nutritious information panels, listing calories, sugars and fat content. ADCA can see no reason why these exemptions should remain.

Exempting alcoholic beverages from requirements to display ingredients and nutrition information on their packages has also been questioned in the literature, with Wilkinson and Room (2009) arguing that “this exemption is hard to justify” and



Kypri et al (2007) stating that “[i]t is hard to understand why alcohol beverages are not subject to the same requirements for disclosing ingredients and nutritional information as non-alcoholic beverages”.

ADCA has in the past welcomed the Federal Government’s commitment to put alcohol misuse with its harms and costs on the political agenda by announcing the National Binge Drinking Strategy, commissioning the National Preventative Health Taskforce to identify ways of reducing alcohol-related harm by 30 per cent by 2020, and asking the Henry Review of Taxation to examine current alcohol taxation legislation.

In 2009, Government increased the tax on Ready-to-drink (RTD) beverages with the objective to reduce excessive alcohol consumption amongst teenagers, as RTDs were identified as a preferred alcoholic beverage of choice amongst this age group. Given that warnings about short-term and long-term effects of alcohol misuse do not tend to prevent excessive alcohol consumption amongst teenagers in particular, it was hoped that increasing the price on RTDs would make them no longer affordable for this age group, thus reducing overall alcohol consumption amongst Australia’s youth. To date, a causal relationship between increased pricing of RTDs and overall reduction of alcohol consumption/ change of drinking behaviour amongst teenagers has not been proven.

Given that price increases of young peoples’ preferred alcoholic beverages have not shown the anticipated changes in drinking behaviour as consumers simply tend to substitute one group of products with another, and that warnings about health effects do not seem to impact on young peoples’ drinking behaviour, consideration should be given to the possibility that nutrition information may actually have the potential to impact on teenagers’ drinking behaviour, especially those who are concerned with weight and body image issues. ADCA believes that more education should occur and community awareness be raised about sugar and calories content of alcoholic beverages as this may help to regulate young people’s alcohol intake: “health information and warning labels can be used as part of a comprehensive and integrated public health strategy that promotes a healthier and safer drinking culture in Australia” (VicHealth 2009).

Kypri et al (2007) argue similarly: “It is possible that consumers, especially some population groups such as weight conscious young women, might be less inclined to drink as much alcohol if they knew the calorie content of what they were consuming”. In April 2007, Kypri et al surveyed 13 000 students on alcohol consumption, health effects, and attitudes towards nutrition/ ingredient labelling. The survey results suggest that more than three quarters want to see both ingredients and nutritional information displayed on alcoholic beverage packaging. Support for the labelling of ingredients was slightly greater among women than men (85 per cent versus 75 per cent) while support for the provision of nutritional information was considerably greater amongst women (83 per cent compared to 65 per cent) (Kypri et al 2007). While the authors noted the lack of studies looking at the effect of ingredient or nutritional information labelling on drinking behaviour, they stated that “it is possible that the current preoccupation with weight gain in many developed countries, including Australia, might be a more compelling motive for behaviour change than alcohol-related injury risk”.



ADCA argues that due to the high sugar and calories content of many alcoholic beverages, and weight gain and body image issues, especially among female teenagers, the current exemptions enjoyed by alcoholic beverages in relation to ingredients lists and nutrition information panels should be revoked.

In its final report, the National Preventative Health Taskforce (NPHT 2009) advocates for mechanisms to be put in place to inform consumers and support healthier food choices by providing easy to understand information on energy, sugar, fat, saturated fats, and salt. Given that many alcoholic beverages contain large amounts of sugar and other additional ingredients such as artificial colours and preservatives, ADCA cannot understand why alcoholic beverages are treated differently to non-alcoholic beverages or food products.

Instead of exempting alcoholic beverages from Standards 1.2.4 and 1.2.8, the display of ingredients and nutrition information should be made mandatory to ensure that consumers make informed choices about their alcohol consumption. In the case of young females, the display of ingredients and nutrition information on packaging of alcoholic products promises to be a successful harm prevention strategy. With the Federal Government not adopting the Henry Review of Taxation's recommendation to introduce volumetric taxation, Australia cannot afford to dismiss another harm minimisation strategy which has the potential to reduce alcohol-related harm in Australia. ADCA believes that the costs associated with displaying this information are minimal in comparison with the potential health costs associated with alcohol misuse.

#### **Recommendations:**

2. ADCA recommends that the exemption for alcoholic products under the *Foods Standard Code* to disclose ingredients and nutritional information is being revoked.
3. The display of ingredients and nutrition information on alcoholic beverage packaging should be made mandatory to ensure that consumers make informed choices about their alcohol consumption.
4. More education should occur and community awareness be raised about sugar and calories content of alcoholic beverages as this may contribute to young people regulating their alcohol intake.

#### **4.3 Standardisation of labelling – Standard drink and alcohol content Information**

Under Standard 2.7.1 of the *Food Standards Code*, an alcoholic beverage must include on its label an indication of how many standard drinks it contains. Clause 1 of Standard 2.7.1 defines a "standard drink" as the amount of beverage with contains 10 grams of ethanol, measured at 20 degrees Celsius. Standard 2.7.1 mandates that the packaging of alcoholic beverages must include a statement of the approximate number of standard drinks in the package, using the words "Contains approximately XX standard drinks". However, no minimum standard of legibility is defined.

In addition, there is no legislated consistency in the graphic presentation and display of standard drink information and alcohol content on the packaging of alcoholic beverages. The display of standard drink logos, which today can be found on a wide range of beer, wine and spirits products, is voluntary. They were developed as a joint initiative of the Distilled Spirits Industry Council of Australia, the Australasian Associated Brewers Inc. and the Winemakers Federation of Australia in 2006 and subsequently were endorsed by all governments across Australia ([http://www.olgr.nsw.gov.au/liquor\\_standard\\_drinks.asp](http://www.olgr.nsw.gov.au/liquor_standard_drinks.asp)). The standard drink logos' main objective is to make it easier for consumers to identify the number of standard drinks contained in a container.

Government and industry are said to have agreed to provide a graphical representation of standard drinks which may be used in place of the previously mandatory wording "Contains approximately XX standard drinks". It has been suggested that a graphic display of standard drink information would indeed more effectively inform consumers about their alcohol intake. Despite currently being voluntary, the minimum height of the logo is 14mm and must be accompanied by the words "Standard Drinks" ([http://www.olgr.nsw.gov.au/liquor\\_standard\\_drinks.asp](http://www.olgr.nsw.gov.au/liquor_standard_drinks.asp)).

ADCA believes that graphical standard drink information should be made mandatory and fully replace the standard drinks message "Contains approximately XX standard drinks", as currently mandated in the *Food Standards Code*. According to Haines and Stockwell (2003), "Larger and more legible labelling would improve the general public's ability to accurately judge their standard drink intake".

In addition to making graphical standard drink information logos mandatory, ADCA believes that guidelines should be developed which standardise format, font, legibility, and colours of the logo, as well as its particular place on the container. For example, the standard drink logo on all alcoholic beverages should be displayed in the lower right corner of the main label, in a specific font size (minimum font size 14), in black writing on white ground to maximise legibility.

Further, there should be standardisation of the logo across all beverage classes, using one graphical glass design, opposed to different glass designs for different beverage types, as currently practised. ADCA believes that numerous designs for the standard drink logo add confusion to the definition of a standard drink being the amount of any one beverage, which contains 10grams of ethanol. While the logo displaying 7.5 standard drinks in the case of a 750ml bottle of wine where 100ml constitute a standard drink is mathematically accessible, in the case of bottled spirits where 30ml constitute a standard drink, the standard drink information is less accessible.

ADCA asks that consideration be given to using a standardised design of a glass to display standard drink information. In this context, ADCA recommends that qualitative market testing is being conducted to establish a standardised standard drink logo design which is considered informative by the general public and displays information about number of standard drinks in a container, millilitre size of a standard drink of the beverage in question and alcohol content in a consistent, and easily accessible way. This market testing should be incorporated in the final recommendation and conducted prior to implementing a mandated standard drink logo. ADCA would be pleased to assist the Review Panel in this context and to

provide additional expert input by facilitating discussions on this matter with State and Territory AOD peaks within the framework of the ADCA Federal Council.

Further, in cases where the size of a standard drink cannot be as easily detected as it can be with wine, a definition of the millilitre amount which constitutes a standard drink of the beverage may be useful additional information. For example: 1 SD = 30ml for inclusion under the standard drink logo. ADCA believes that the reference to standard drink sizes is particularly important in the context of enabling people to follow the NHMRC Alcohol Guidelines.

ADCA questions whether standard drink definitions for different alcoholic beverages and the Australian Alcohol Guidelines by the National Health and Medical Research Council are widely known amongst the general public and urges that more community education is being undertaken on these matters. A fact sheet on standard drinks produced by the Australian Drug Foundation provides an insight into the complexity of the matter at hand ([http://www.druginfo.adf.org.au/downloads/fact\\_sheets/FS\\_1.25\\_standard2009.pdf](http://www.druginfo.adf.org.au/downloads/fact_sheets/FS_1.25_standard2009.pdf)).

**Recommendations:**

5. Graphical standard drink information logos should be made mandatory and fully replace the standard drinks message "Contains approximately XX standard drinks".
6. Binding guidelines should be developed which standardise format, font, and colours of the logo, as well as its particular place on the container to maximise legibility.
7. The standard drink logo should be standardised across beverage classes.
8. Consideration should be given to the suggestion to include as part of the standard drink logo a definition of the millilitre amount which constitutes a standard drink of the specific beverage, e.g. 1 SD = 30ml.
9. More community education should be conducted in relation to standard drink definitions for different alcoholic beverages and the Australian Alcohol Guidelines by the National Health and Medical Research Council.
10. ADCA recommends that qualitative community/ industry/ AOD sector market testing be incorporated as an integral part of the development of a standard drinks logo which is considered informative by the general public prior to it being mandated and implemented.

#### **4.4 Introduction of health advisory information labels**

In February 2008, ADCA lodged a submission with Food Standards Australia New Zealand on Application A576 (Labelling of Alcoholic Beverages with a Pregnancy Health Advisory Label), offering strong support for 'Option 2', namely the mandating of health warning labels to be placed on all alcoholic beverages, advising consumers that alcohol is harmful for people who are trying to become or are pregnant as well as for the general public. ADCA's position has not changed since that submission.

ADCA continues to advocate for the introduction of health information labels on all alcoholic products since it believes that consumers need to be informed at the "point of purchase" that the product they are consuming may have a serious impact on their health and well-being: "Knowing the facts about alcohol beverages offers legal adult consumers the ability to make informed choices about what they drink" (ICAP 2008). ADCA subsequently urges that the importance of both health warning labels and nutrition information targeting the whole population and not just pregnant women be recognised. There is a public health interest in describing the health risks associated with consuming certain products. Government should be acting in the best interest of all consumer groups and their right for transparency and information and make health warning and information labels for alcohol products mandatory.

This recommendation is supported by findings from qualitative research into health information labels on alcoholic beverages commissioned by VicHealth in 2009. Survey participants showed a strong tendency to self-exempt from specific labels and messages, arguing that these labels would be good for other people. It is therefore recommended that "consideration should be given to developing the labels and messages with the aim of increasing awareness amongst the general population of the range of health consequences of alcohol, rather than attempting to direct specific messages to specific groups" (VicHealth 2009).

Evidence suggests that alcohol information labels are well-supported by the Australian public. A recent survey of university students found that more than three quarters of those sampled would like ingredient and nutritional information displayed on alcoholic beverage packaging (Kypri et al 2007). Further, strong majorities of respondents in the 2007 National Drug Strategy Household Survey indicated support for increasing the size of standard drink labels on alcohol containers (66%) and for adding information from the national drinking guidelines to alcohol containers (71%) (AIHW 2008).

ADCA notes that the Australian alcohol industry has raised concern over the added cost burden of health warning labels. Warning labels reviews and research, however, estimate that introduction and implementation costs would be "very low" (Stockwell 2006). In fact, those Australian alcohol producers which export their products to the US have already established a precedent in meeting statutory requirements for sale and distribution of Australian alcohol products for off shore markets. They are required to label their products with a health warning to comply with American legislation. ADCA notes that these labelling requirements do not seem to impact on Australian alcohol producers' export activities and that subsequently domestic product labelling should be aligned with what is already required in an export context.

In the American context where mandatory health warning labels on alcoholic beverage containers were introduced in 1989, it has been continually stressed that “there is evidence that warning labels impact knowledge, awareness, intentions, and perceptions” and “result in more conversations about risks among frequent drinkers” (Babor et al 2010). Stockwell (2006) summarises similarly: “Health researchers commenting on the studies have almost universally suggested that warning labels have the potential to contribute to positive outcomes as part of a larger range of more proven strategies, and especially if they are enhanced so as to be more noticeable, impactful and varied”.

There is, however, little to no evidence available that demonstrates that health warning labels did actually trigger measurable change in drinking behaviour (Babor et al 2010). At the same time, no negative consequences of health warning labels have been demonstrated (Stockwell 2006).

Given inconclusive findings where research has been conducted and the overall lack of evaluation of the impacts of health warning labels on drinking behaviour in those countries where they are mandatory, ADCA urges that the introduction and implementation of mandatory health warning labels in Australia will be closely monitored and evaluated from the outset to assess their potential as an element of a successful harm minimisation strategy for alcohol.

Wilkinson and Room (2009) looked at international experience with warnings on alcohol containers and evidence on effects, and recommended that against this background, warning labels should be included on all alcoholic beverages in Australia and that they should “be graphic and attention-getting, should occupy a considerable proportion of the package surface, and should involve rotating messages.” They added that “given the profile of problems related to drinking, the messages should address social as well as health and injury problems, and problems for others around the drinker as well as for the drinker him/herself.”

Warning labels on alcoholic product packaging are often discussed in conjunction with health warning labels on cigarette packages which have been mandated in a larger amount of countries than alcohol warning labels have been to date, reflecting the much lower acceptability of nicotine as a recreational drug compared with alcohol (Stockwell 2006). The tobacco industry finally accepted that appropriate branding of its products was necessary for the health of the community (Smoke Free Australia 2008). Other examples include Sun Safe with ‘Slip, Slop, Slap’, and the Clean Up Australia campaign which started out as an annual activity, but which in fact is adhered to on a daily basis by our children. ADCA and the AOD sector strongly advocate that a similar approach be taken in the case of the branding of alcohol products.

The National Preventative Health Taskforce in its final report (NPHT 2009) required health advisory information labelling on containers and packaging of all alcohol products to communicate key information that promotes safer consumption of alcohol (action 3.3), including nutritional data, ingredients, and clearly legible information on the amount of alcohol by volume and number of standard drinks. ADCA strongly supports this recommendation.

The Commonwealth Government in its response to the NPHT's final report noted this recommendation and states that it is giving it further consideration. ADCA finds this lack of commitment to enhance consumer information and the health of all Australians disappointing. There is no commitment from the Federal Government to support a holistic approach to health warning labels and to displaying health information on packaging that go beyond addressing a particular population group, e.g. pregnant women.

**Recommendations:**

11. The display of health information labels should be mandated on all alcoholic beverage packaging to enable consumers to make informed choices about their alcohol intake.
12. Health advisory information labels should target the general population, rather than attempting to direct specific messages to specific groups.
13. The introduction and implementation of mandatory health warning labels in Australia should be closely monitored and evaluated from the outset.
14. Health advisory information labels should be graphic and attention-getting, occupy a considerable proportion of the package surface, and involve rotating messages.

**5. Conclusion**

ADCA believes that the strategies discussed above possess potential to reduce alcohol-related harm as part of a multi-faceted harm minimisation strategy for alcohol by informing consumers about health impacts, standard drinks, alcohol content, nutrition information, and ingredients at the point of purchase, thus allowing them to make informed choices about their intake. The strategies outlined above are all low on cost, and the benefits of their implementation have the potential to positively outweigh the costs in the long-term, by supporting Australian in leading a healthier, more informed lifestyle.

ADCA would be pleased to assist the Review Panel further in its Review of Food Labelling Law and Policy in Australia, and to expand on any of the issues addressed in this submission.

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