

Submission to Food Standards Australia new Zealand (FSANZ)

INITIAL ASSESSMENT REPORT – APPLICATION A576 – LABELLING OF ALCOHOLIC BEVERAGES WITH A PREGNANCY HEALTH ADVISORY LABEL

ADCA - Who we are and what we do

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 principally funded through the Australian Government's Community Sector Support Scheme and the National Drug Strategy Program. Some additional funding is provided through membership fees, subscriptions and project activities.

As the national peak body, ADCA has a key role in advocating for adequate infrastructure support and funding for the delivery of evidence-based alcohol and other drug initiatives. In this regard ADCA represents the interests of a broad group of service providers and individuals concerned with prevention, early intervention, treatment, supply reduction and research.

At 31 December 2007, ADCA's membership covering Associate Organisations, Organisational, and Individuals totaled 378 – covering organisations, services, agencies and individual professionals, practitioners engaged in alcohol and other drug services throughout Australia, major university research centers, tertiary institutions offering courses in addiction studies and other programs for alcohol and other drugs workers, law enforcement and criminal justice systems, policy development and analytical areas, and administration. ADCA's broad and diverse membership base across all jurisdictions provides input on key strategic issues through active participation as members of ADCA's Reference Groups.

Consultation

ADCA conducted an extensive consultation process on the initial assessment report (Application A576 – Labelling of Alcoholic Beverages with a Pregnancy Advisory Label) issued for public consultation by Food Standards Australia New Zealand (FSANZ) on 12 December 2007.

There was unanimous support from the alcohol and other drugs (AOD) sector, including State/ Territory Peak organisations and the non-government organisation (NGO) sector, for FSANZ's reasoning and decision to accept the application, but as a first step.

The alcohol and other drugs (AOD) sector considers that it would be inappropriate to only have single warning label for pregnancy as this implies the wider harms caused by excessive alcohol consumption are not as important.

NOTE: ADCA wishes to formally recognise comments provided by stakeholders such as the Victorian Alcohol and Drug Association (VAADA); Arbias, the Alcohol and other drug Related Brain Injury Australian Services in Victoria; the Alcohol, Tobacco and other Drugs Council Tasmania Inc; the Network of Alcohol and Drug Agencies (NADA); the Alcohol and Drug Foundation Australian Capital Territory (ADFACT); the Drug and Alcohol Service, DASwest, Western Hospital Drug and Alcohol Unit, Footscray, Victoria; Anglicare Australia; the Salvation Army; and the ADCA Board.

ADCA's Position

ADCA, with unanimous support from the AOD and NGO sectors, strongly supports Option 2 in the Assessment Report and recommends that alcoholic beverages should carry warning labels on the risks of alcohol in ALL instances, not just prior to or during pregnancy.

This is an important significant step that supports evidence-based research into the potential impact of alcohol on unborn children, and which leads to brain impairment and other alcohol-related complications.

Alcohol advertising and promotion is currently self-regulated by industry bodies, rather than by the Federal Government. ADCA believes that this regulation is ineffective and does not accord with public views on when and how restrictions should be applied. ADCA calls for a system of government regulation of advertising and promotion of alcoholic beverages which aims to reduce the health and social harm from alcoholic beverages.

Advertisements in any medium for alcoholic beverages should be required to include a series of warning messages about the potential harms of use; similar to what has been carried out within the tobacco industry. Academic research and formal assessments of national public awareness campaign indicate the importance of rotating warnings that change the message from one label to another – there is less likelihood of them becoming overlooked.

Queries

Please direct queries regarding ADCA's Submission to Brian Flanagan, Strategic Communications and Policy Officer, Alcohol and other Drugs Council of Australia – 02 6281 0686 (w), 0400 860 058 (m); brian.flanagan@adca.org.au, or David Templeman, Chief Executive Officer ADCA – 02 6281 0686 (w), 0414 265 122.

5 February 2008

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