

Sarah Gibbons
Labelling Information Standards
FSANZ
By email: sarah.gibbons@foodstandards.gov.au

Friday, 5 July 2019

Dear Sarah,

Re: ACM Response to the P1050 Pregnancy Warning Labels consultation

Many thanks for the opportunity to provide written comment to the consultation that we were unable to attend.

3.1. Beverages to carry the warning label

ACM believes there is a requirement for consistency across products that contain alcohol, and in addition it is imperative to ensure that the message is consistent in that it advises that zero alcohol during pregnancy or breastfeeding is the message we want to convey to the community. The risk of exempting products with a lower ABV% would perpetuate mixed messages - the very issue at the heart of this mandating process. If it contains alcohol it should have a label.

At a minimum the warning label should be on 0.5%ABV beverages and above.

3.2. Application to different types of sales and packages

ACM believe that individuals should be able to see the warning at point of sale and at point of consumption so the labels should be on the outer package AND on bottle(s) and containers inside the packaging.

If required due to spacing, we suggest the pictogram only could be located on 100ml containers.

Labels to be horizontal, not vertical.

3.3. Transitional arrangements

ACM strongly support a 12 months transition to ensure that the implementation and rollout are completed promptly and minimise the amount of time that alcoholic products without the revised warning labels are available on shelves.

5.1. Principles for 'attention' elements

ACM believe the following elements will provide the clearest message:

- Standardised minimum size and font
- Red circle and cross across the pictogram
- Black printing on white background
- Box around the warning

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- A minimum 3mm empty space outside the box

5.2. Proposed approach for label format

ACM believe that it is important to ensure that other messaging related to alcohol use (such as 'enjoy in moderation' etc) to be prohibited so as to ensure there is clarity in the messaging that zero alcohol during pregnancy or breastfeeding is the message we want to convey to the community.

Consumer testing is a vital element in the development and acceptance process.

Other – we believe that an update on the revision of the NHMRC alcohol guidelines is important to ensure that the labelling is the same as guideline.

Yours sincerely,



Ruth King

Midwifery Advisor

Midwife, BMid, BMid (Hons)

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The Australian College of Midwives acknowledges the Traditional Custodians of the land on which we work and live.