

25 August 2011

To: Labelling Review Response Secretariat,

Feedback on the Labelling Logic Report's alcohol labelling recommendations

We welcome the opportunity to provide feedback on the recommendations of the *Labelling Logic* Report regarding the labelling of alcoholic beverages. Our response addresses the questions outlined in the alcoholic beverages discussion paper.

We would like to note our strong support for the recommendations relating to alcohol in the *Labelling Logic* report (recommendation numbers 24-27 and 55). These recommendations are consistent with the recommendation of the National Preventative Health Taskforce to 'Require health advisory information labelling on containers and packaging of all alcohol products to communicate key information that promotes safer consumption of alcohol'.

We urge that the recommendations of the Review Panel in regard to alcohol be implemented as a matter of priority. We believe that there is scope for the recommendations relating to alcohol to be considered and actioned separately from the other recommendations so as to expedite the process.

The voluntary health warning labels proposed by the drinks industry and its Drinkwise organisation are in no way sufficient to address the Review Panel's proposal for generic alcohol warning messages and warning messages aimed at pregnant women. We believe the voluntary messages proposed by Drinkwise are soft and indirect, and should not be used to prevent the introduction of further government imposed warnings.

The Alcohol Education and Rehabilitation Foundation (AERF) have proposed a series of health warning labels which we believe are consistent with the Review Panel's proposal for generic alcohol warning messages and warning messages aimed at pregnant women. The AERF have proposed five health warning messages with one related to the risks of consuming alcohol while pregnant. The AERF's proposed health warning labels are consistent with health warnings which would be expected to have an impact on consumers; the messages are specific, unambiguous and are targeted at specific types of harm.

Alcohol is no ordinary commodity. Alcohol is known to contribute to a range of serious short and long terms harms including assault injuries, falls, road crashes, some cancers, harm to the developing foetus

and harm to the developing brain. The point of sale and consumption of alcohol is an important opportunity for the Government to provide clear information to the consumer as to the product's contents and the risks inherent with the consumption of alcoholic products.

The exemption of alcoholic products from the requirements of the Food Standards Code to provide a list of ingredients and nutrition information panels cannot be justified and must be addressed. Consumers are entitled to be fully informed as to the products they consume. Recommendations 26 and 27 go some way to addressing this and should be required by all alcoholic products.

Health warning labels should be mandatory on all alcoholic product packaging and at the point of sale for unpackaged liquor in Australia. The implementation of the warning labels must have regard to the consistency in size, font and application of the health warning labels on all alcoholic products. The warning labels should comprise both text and symbol to ensure they are understood by a broad audience. The placement of the warning labels on packaging should be standardised and appear on the front of the container, horizontally oriented and made distinct from the rest of the packaging design. Health warning labels should be evaluated for the impact on attitudes and behaviours and reviewed periodically to ensure their resonance is maintained.

Alcohol product labels should comply with nutrition labelling requirements of other foods and beverages, including a mandatory nutrition information panel and a list of ingredients. The label should include the energy content per 100 mL. Alcohol labels should be prohibited from presenting positive health claims that may be misleading to consumers (e.g. 'low in calories'). Further detail as to the requirements of effective health warning labels and Nutrition Information Panels is outlined in the AERF policy position paper, *Alcohol product labelling: health warning labels and consumer information* (available at www.aerf.com.au).

We believe that the provision of strong, specific, government-regulated, rotating health warning labels on alcoholic products and at the point of sale for unpackaged liquor is an important and necessary element of a comprehensive public education strategy regarding the risks of alcohol consumption. More broadly, health warning labels on alcoholic products are an important component of a comprehensive package of interventions to prevent harms from alcohol among the Australian population. We urge that the recommendations of the Review Panel in regard to alcohol be implemented as a matter of priority.

We further urge the Labelling Review Response Secretariat to make arrangements for roundtable discussions to be held in Perth, in addition to those in Sydney and Melbourne, to enable WA-based stakeholders the opportunity to provide further feedback on this important matter.

Yours sincerely,

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