

25 October 2017

The Hon Dr David Gillespie MP
Assistant Minister for Health
House of Representatives
Parliament House

By email: david.gillespie.mp@aph.gov.au

Dear Assistant Minister,

The McCusker Centre for Action on Alcohol and Youth and the Telethon Kids Institute are aware that pregnancy warnings on alcohol labels are currently under review by the Australian and New Zealand Ministerial Forum on Food Regulation. We write to you as a member of the Forum to advise you of current research and best practice on alcohol warning labels, particularly in regard to pregnancy. We have particular concerns about the effectiveness of the current warnings which were developed by the alcohol industry, and urge that these be replaced with mandatory, strong and specific warning labels developed on the basis of the best available evidence to contribute to raising awareness of risks associated with drinking during pregnancy.

The McCusker Centre for Action on Alcohol and Youth at Curtin University is committed to reducing harms from alcohol among young people. The work of the McCusker Centre is directed towards raising awareness of the magnitude of alcohol-related harms among young people, the evidence-based approaches we know can work, other options and the need to act without delay.

The Alcohol, Pregnancy and Fetal Alcohol Spectrum Disorder (FASD) Research Group at Telethon Kids Institute is committed to improving the health and wellbeing of children through excellence in evidence based research and translating this research to reduce alcohol consumption in pregnancy; improving clinical practice and diagnosis of FASD; and supporting appropriate interventions, management and services for people with FASD.

We recognise that the second evaluation of voluntary pregnancy warnings in alcohol labels is underway and that the evaluation has not sought broad public input. We hope the evaluation will have a particular focus on the effectiveness of the current labels in informing the community of the risks associated with the use of alcohol in pregnancy.

Fetal Alcohol Spectrum Disorder (FASD)

Almost half of Australian women (44%) still consume alcohol while pregnant.¹ Reducing alcohol use during pregnancy will reduce the prevalence and severity of FASD, an entirely preventable but incurable condition caused by the baby's exposure to alcohol in the womb. FASD is a severe, pervasive neurodevelopmental disorder that is characterised by severe impairment in at least three of ten developmental domains (brain structure/neurology, academic, executive functioning, attention/activity/sensory processing, memory and learning, cognition, language, motor skills, adaptive/social communication/social skills, and affect regulation).² These impairments can result in a wide range of problems including learning difficulties, reduced capacity to remember tasks from day to day, and anger management and behavioural issues, and often lead to school failure, mental health and drug and alcohol problems and engagement with the law.³ Prenatal alcohol exposure is the major cause of non-genetic intellectual disability in Australia.⁴ A comprehensive approach to raising awareness of the risks associated with alcohol use during pregnancy is incredibly important as we strive to prevent alcohol-exposed pregnancies.

Health warning labels: Best practice

Warning labels are an effective public health tool to inform consumers of harms associated with a product. A systematic review of the extensive research on warnings from the tobacco field found that health warnings on packages were among the most direct and prominent means of communicating with smokers.⁵ Health warnings are an important source of health information and they increase knowledge about tobacco use harms and perceptions of risk.^{5,6}

Research suggests that for alcohol warning labels to be most effective, they should be large enough to be easily noticed and read; appear on the front rather than the side of packaging; be varied frequently to avoid overexposure; and contain a clear, simple, direct and accurate message about the specific health effects of alcohol.⁷ Community support for alcohol warning labels is strong; in 2016, 65% of Australians supported "requiring information on national drinking guidelines on all alcohol containers".⁸

Concerns about the DrinkWise labelling scheme

We understand that in 2011, the alcohol industry was afforded the opportunity to develop and implement, on a voluntary basis, warnings on alcohol products about the risks of consuming alcohol while pregnant. Following an evaluation of the voluntary initiative in 2014, this situation remains in

¹ Australian Institute of Health and Welfare. 2016 National Drug Strategy Household Survey report. Drug statistics series no. 31. Cat no. PHE 214. Canberra: AIHW.

² Bower C, Elliott EJ, Zimmet M, Doorey J, Wilkins A, Russell V, Shelton D, Fitzpatrick J, Watkins R. Australian Guide to the diagnosis of fetal alcohol spectrum disorder: a summary. *J Paediatr Child Health* 2017;53:1021-1023.

³ Streissguth AP, Bookstein FL. Risk factors and adverse life outcomes in fetal alcohol syndrome and fetal alcohol effects. *Journal of Developmental and Behavioural Pediatrics*. 2004; 25(4): 228-38.

⁴ O'Leary C, Leonard H, Bourke J, D'Antoine H, Bartu A, Bower C. Intellectual disability; population-based estimates of the proportion attributable to maternal alcohol use disorder during pregnancy. *Developmental Medicine & Child Neurology*. 2013; 55(3): 271-277.

⁵ Hammond D. Health warning messages on tobacco products: a review. *Tobacco Control*. 2011.

⁶ Campaign for Tobacco Free Kids. Factsheet: Tobacco health warnings: evidence of effectiveness. November 2016. Available from: <https://www.tobaccofreekids.org/assets/factsheets/0325.pdf>.

⁷ Jones S, Gordon R. Alcohol warning labels: are they effective? Deebie Institute evidence brief. AHHA; 2013.

⁸ Australian Institute of Health and Welfare. National Drug Strategy Household Survey 2016: detailed findings. Drug Statistics series no. 31. Cat. no. PHE 214. Canberra: AIHW. 2017.

place. We understand that Siggins Miller have been contracted to conduct a second evaluation in 2017.

Development of the voluntary alcohol labels was led by DrinkWise. DrinkWise is a social aspects/public relations organisation (SAPRO), established and funded by the alcohol industry. Public health experts have strongly criticised the alcohol industry's use of DrinkWise to create an impression of social responsibility while opposing effective policy measures.^{9,10} A study of alcohol industry submissions to an inquiry into FASD found that alcohol industry bodies used the DrinkWise voluntary labelling initiative to suggest that these activities are sufficient in the prevention of FASD, and that there isn't a need for further action.¹¹ Implementation of a voluntary alcohol labelling scheme by DrinkWise was found to be a tactic by the alcohol industry for delaying mandatory, independent labelling.¹¹ There is also widespread misunderstanding in the community about the association between DrinkWise and the alcohol industry.¹²

The main component of the DrinkWise labels is the 'Get the facts' logo that provides a link to the DrinkWise website. Producers also have the option of adopting an issue-specific message 'It is safest not to drink while pregnant' or a pictogram of a silhouette of a pregnant woman. Versions of the DrinkWise labels include: text 'Get the facts DrinkWise.org.au'; pregnancy silhouette with a green strike through the image; text 'It's safest not to drink while pregnant DrinkWise.org.au'; text 'Get the facts DrinkWise.org.au' with the pregnancy silhouette and the text 'It's safest not to drink while pregnant'; and text 'Get the facts DrinkWise.org.au' with the pregnancy silhouette.

Uptake of the labels by the alcohol industry

Earlier reviews found low uptake of the DrinkWise labels. Even if it is found in the second evaluation that uptake of the DrinkWise labels has increased to a level considered appropriate by the Forum, there are significant concerns about the effectiveness of the labels on the basis of the message content, size and placement on the labels.

Content of the labels and label types

Warning labels should contain a simple, direct and accurate message about the specific health effects of alcohol. An audit conducted by the Foundation for Alcohol Research and Education (FARE) in 2013 found that the most commonly observed health message on alcohol products was the "Get the facts drinkwise.org.au" logo used in conjunction with the pregnancy silhouette.¹³ These were found on 40% of products carrying DrinkWise labels (15% of all products audited). A further 11% carried the pregnancy silhouette (4% of all products audited) and only 2% (1% of all products

⁹ Miller P, de Groot F, McKenzie S, Droste N. Vested interests in addiction research and policy. Alcohol industry use of social aspect public relations organizations against preventive health measures. *Addiction*. 2011; 106(9): 1560-1567.

¹⁰ Jones SC, Hall, S, Kypri K. Should I drink responsibly, safely or properly? Confusing messages about reducing alcohol-related harm. *PLoS ONE*. 2017; 12(9): e0184705.

¹¹ Avery MR, Droste N, Giorgi, C, Ferguson A, Martino F, Coomber K, et al. Mechanisms of influence: Alcohol industry submissions to the inquiry into fetal alcohol spectrum disorders. *Drug and Alcohol Review*. 2016; 35(6): 665-672.

¹² Brennan E, Wakefield M, Durkin SJ, Jernigan D, Dixon HG, Pettigrew S. Public awareness and misunderstanding about DrinkWise Australia: a cross-sectional survey of Australian adults. *Australian and New Zealand Journal of Public Health*. 2017; 41(4):352-357.

¹³ Ipsos Social Research Institute. Alcohol label audit. Foundation for Alcohol Research and Education; September 2013.

audited) carried the pregnancy silhouette together with the message “Not drinking is the safest option for women who are pregnant, planning a pregnancy or breastfeeding”.

The 2014 evaluation of the alcohol labels commissioned by the Australian Government and conducted by Siggins Miller found that out of the DrinkWise pregnancy labels on alcohol products, the most common version was the pregnancy silhouette health warning (79% of products carried a pregnancy warning), followed by text pregnancy health warning (20%) and text and pregnancy silhouette (1%).¹⁴ Of the 21% of pregnancy labels that used text, 82% were consistent with the National Health and Medical Research Council guideline.

The label ‘Get the facts’ with a DrinkWise logo and a link to the DrinkWise website is not in itself a public health message or a warning label, and does not inform consumers of the risks associated with alcohol use or how to avoid harms from alcohol misuse. The pregnancy silhouette does have some merit. However, the Siggins Miller evaluation found that the use of the colour green in the pictogram can confuse the message among consumers by suggesting that alcohol should be consumed.

Size and placement of labels

Health warning labels should be large enough to be easily noticed and read and should appear on the front, rather than the back or side of packaging. The DrinkWise labels do not appear to be consistent with best practice. The 2013 FARE audit found that most (86%) of the DrinkWise labels observed took up less than 5% of the alcohol label. A further 14% took up 5-10% of the label space.

The placement of the labels was also found to be inadequate in the 2013 FARE audit, with only 5% of products placing the DrinkWise label on the front of the product. Three in five (59%) labels were on the back of the product, and a further 29% were on the side. The audit also found that DrinkWise labels appeared to be most commonly located on the edges of product labels and rarely featured in central or prominent locations. The Siggins Miller audit confirmed these findings, and found that the majority (81%) of the pregnancy health labels were located on the back of the product.

The size and placement of a warning label are important aspects contributing to its effectiveness and should be comprehensively assessed as part of the current review of the labels.

DrinkWise website: Visitation rates and website content

The ‘Get the Facts’ and other DrinkWise labels generally direct consumers to the DrinkWise website. We have a number of concerns about this. The DrinkWise website is not an appropriate link for a warning label. As the screenshots of the DrinkWise website homepage in Appendix 1 show, none of the current website homepage content relates to alcohol and pregnancy. Instead, the homepage content appears to promote the alcohol industry’s corporate social responsibility efforts, and visitors would need to search for information on alcohol and pregnancy. It is unrealistic to expect consumers to go to this much effort to find out about the risks of drinking during pregnancy.

This is borne out by research showing that very few people visit the DrinkWise website for further information. Just 7% of Australian adults surveyed in 2015 reported visiting the website, and of these, 80% reported doing so due to seeing the logo while 20% visited for other reasons.¹⁵

¹⁴ Siggins Miller. Evaluation of the voluntary labelling initiative to place pregnancy health warnings on alcohol products. May 2014.

¹⁵ Coomber, K, Martino F, Barbour R, Mayshak R, Miller G. Do consumers ‘Get the facts’? A survey of alcohol warning label recognition in Australia. BMC Public Health. 2015; 15: 816.

There is also cause for concern about information provided on the DrinkWise website. Recent research shows that alcohol industry websites and documents, including those of DrinkWise, mislead consumers on the link between alcohol and cancer.¹⁶ The DrinkWise website was found by the researchers to particularly mislead consumers on the link between breast cancer and alcohol use, a link that is well established. Given that there are concerns about information about cancer and alcohol on the DrinkWise website, we have to question the validity of other information presented by DrinkWise.

The current arrangement relies on an alcohol industry group to source, interpret and communicate health evidence. We question whether they have the appropriate expertise to do this. The communication of accurate, up-to-date information in an appropriate form about the risks of alcohol in pregnancy is too important to leave to those without the necessary expertise and who have been shown to misrepresent other important health risk information.

Recall and awareness of the DrinkWise labels

Australian research regarding the DrinkWise 'Get the Facts' logo shows that recall of the warning label was non-existent and that overall awareness of the logo was low in 2015.¹⁵ The researchers found that no study participants freely recalled the 'Get the Facts' logo, and once prompted, only 25% recognised the logo. While recall of the alcohol pregnancy warning label (any version) was the highest of all warning labels, it was still low (16% of Australian adult participants recalled the label).

The Siggins Miller evaluation also found low awareness of pregnancy warning labels; only 4% of women surveyed were aware of the label when not prompted. When presented with the DrinkWise green pregnancy silhouette, 42% of the target group of women reported awareness of it.

These research findings clearly show that awareness of the pregnancy warning labels among consumers is low. We believe that there is a need to introduce larger, more prominent labels on the front of the product with a strong public health message in order for the warning labels to have the desired impact.

Concerns about a voluntary scheme developed and implemented by the alcohol industry

Warning labels should be developed by governments with advice from relevant experts free of commercial interests, and should be designed to get through to the target group/s. The alcohol industry, which spends hundreds of millions of dollars each year promoting its products, with much of this promotion having a clear appeal to young people and to women of child-bearing age, should not be responsible for developing health warning labels. The alcohol industry has a vested interest in limiting the impact of warning labels. We recognise that the alcohol industry would have a role in implementing a proper labelling system, but industry involvement should be limited and clearly defined, and should not extend to the development of health warning messages or the design of labels.

Further, the voluntary nature of the labelling initiative means that there is no guarantee that messages will be or remain consistent in form, placement, size and/or content. There is also no guarantee that they will be displayed on all products and no guarantee that appropriate messages will be displayed on relevant products.

¹⁶ Petticrew M, Maani Hessari N, Knai, C. How alcohol industry organisations mislead the public about alcohol and cancer. Drug and Alcohol Review. 2017.

DrinkWise is a public relations organisation and its website is a public relations tool. DrinkWise is not an appropriate source of information on risks of alcohol in pregnancy. The message presented on the warning label should be a complete health-warning message in itself, and should not rely on external websites and other sources to convey the relevant information. We believe that development of health warning labels on alcohol products is far too important to leave to the alcohol industry, particularly given the significant conflicts of interest.

Recommendations

The DrinkWise labels are inadequate to achieve the recommendation of the *Labelling Logic* report that “a suitably worded warning message about the risks of consuming alcohol while pregnant be mandated on individual containers of alcoholic beverages and at the point of sale”. The DrinkWise labels are too weak and indirect to be effective in educating the public on the risks of consuming alcohol while pregnant. They should therefore be replaced with effective labels.

At the recent Global Alcohol Policy Conference in Melbourne, we were impressed at the emphasis placed on FASD and its prevention, including by the Minister for Health, Hon Greg Hunt MP, and yourself. The provision of strong, specific, government-regulated health warning labels aimed at pregnant women, on alcohol products and at the point of sale, is an important element in preventing FASD. The introduction of appropriate pregnancy warnings on alcohol labels will contribute to national efforts to prevent FASD, including through the National FASD Strategy that is currently in development.

We urge the Forum to implement strong, government-regulated health warning labels on alcohol products, as an important component of a comprehensive approach that will complement the important measures and commitments already made by the Australian Government to address FASD.

Yours sincerely,

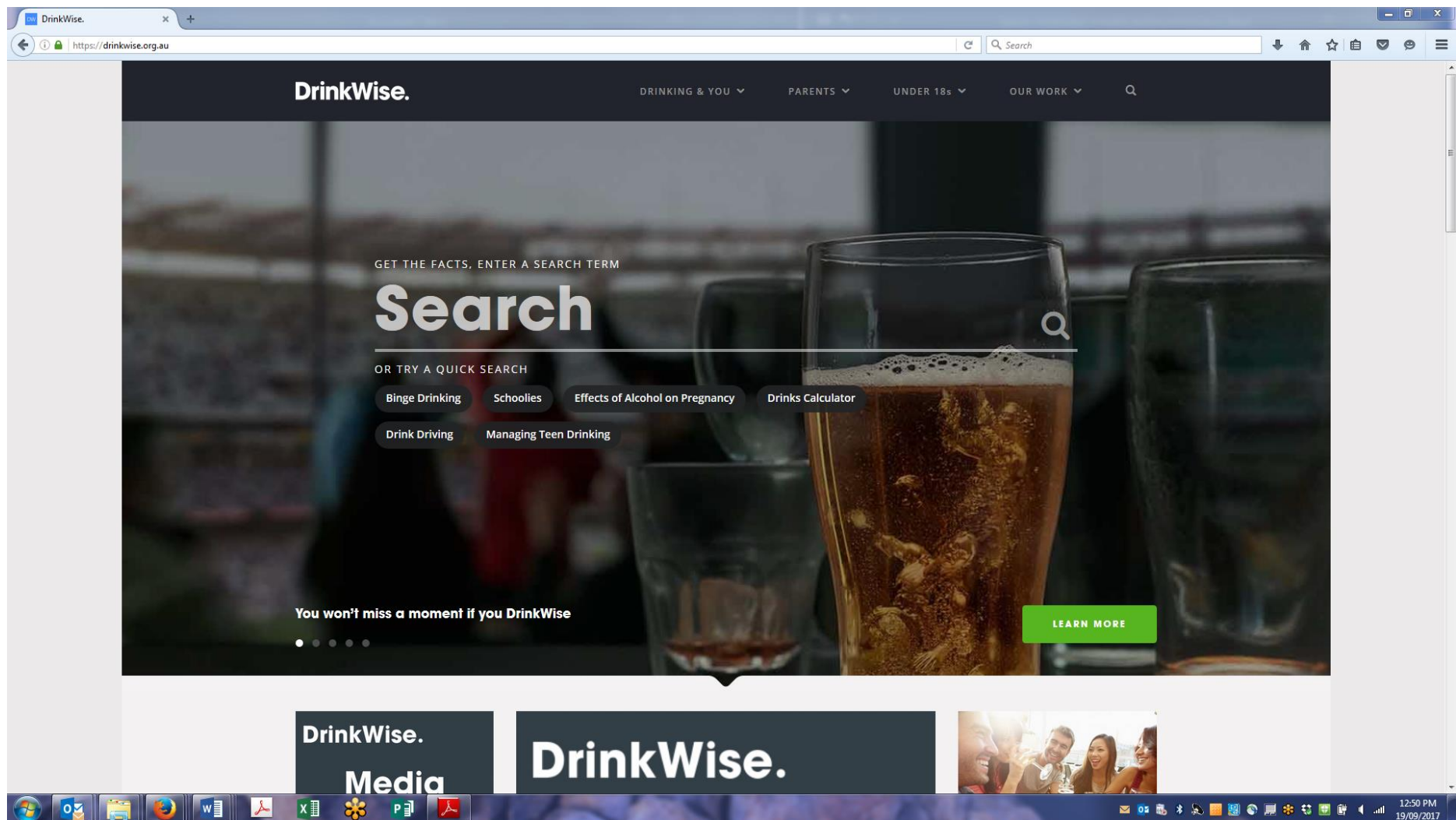
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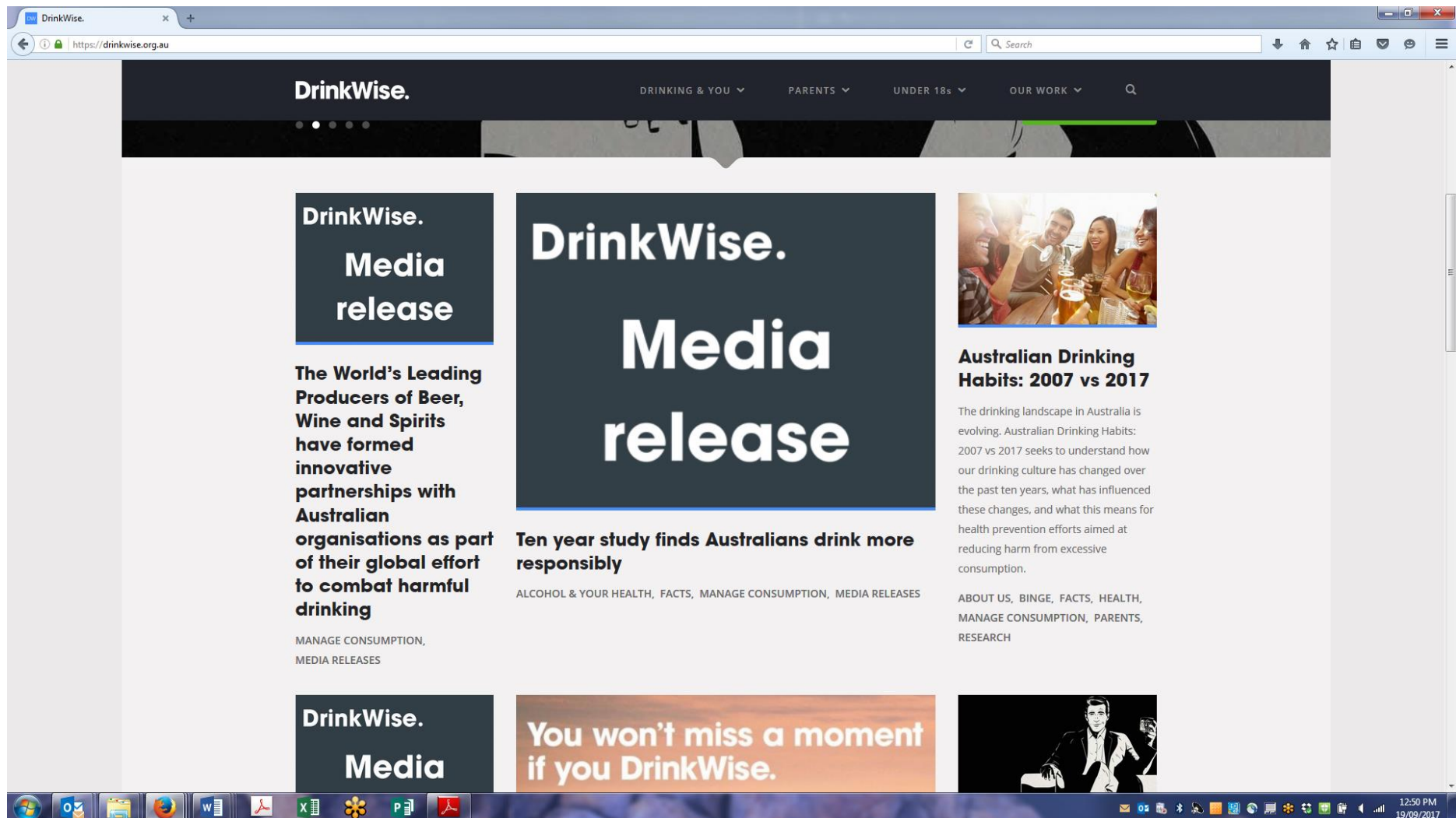
Professor Carol Bower
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TELETHON KIDS INSTITUTE

Dr James Fitzpatrick
HEAD, ALCOHOL AND PREGNANCY &
FASD RESEARCH
TELETHON KIDS INSTITUTE

CC: Ms Elizabeth Flynn, Australian Department of Health

Appendix 1 Screenshots of the DrinkWise website home page, taken on 19 September 2017





DrinkWise.
DRINKING & YOU
PARENTS
UNDER 18s
OUR WORK

DrinkWise.
Media release

DrinkWise lauds AIHW alcohol findings - showing significant improvement in Australia's drinking culture

AIHW SURVEY, MANAGE CONSUMPTION, MEDIA RELEASES, MODERATION

DrinkWise.
Media release

DrinkWise announces new safe ride partnership with

You won't miss a moment if you DrinkWise.

You won't miss a moment if you DrinkWise

CAMPAIGN, CAMPAIGNS, MANAGE CONSUMPTION, YOU WON'T MISS A MOMENT

Drinking: Do it Properly

CAMPAIGN, HOW TO DRINK PROPERLY, MANAGE CONSUMPTION, TEENS

The most important thing when it comes to talking to your

9

DrinkWise. DRINKING & YOU PARENTS UNDER 18s OUR WORK

announces new safe ride partnership with Uber
 DRINK DRIVING,
 HOW TO DRINK PROPERLY,
 MEDIA RELEASES

'You're still going to get in trouble. But we want you around to get in trouble.'
 CAMPAIGN, PARENTS, SUPPORT, TEENS

Some well-known parents on their first experience with alcohol and why it's different for kids these days.
 CAMPAIGN, PARENTS, SUPPORT, TEENS

'Help - my teenager has just started going to parties. And I'm terrified.'
 PARENTS, SUPPORT, TEENS

How early is too early to have 'the talk' with your kids?
 PARENTS, SUPPORT, TEENAGERS, TEENS


12:55 PM 19/09/2017

DrinkWise.

DRINKING & YOU ▾ PARENTS ▾ UNDER 18s ▾ OUR WORK ▾

https://drinkwise.org.au

Search



Mamamia's five types of teenagers. Which one is yours?

PARENTS, SUPPORT, TEENS

DrinkWise.

Media release

How to Drink Properly campaign wins two effectiveness awards

CAMPAIGN,
HOW TO DRINK PROPERLY,
MEDIA RELEASES

Hon Trish Worth awarded as a Member of the Order of Australia

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