



Mr Graham Perrett, MP
 Chair, House Standing Committee
 on Social Policy and Legal Affairs
 House of Representatives
 Canberra ACT 2601

By email to: spla.reps@aph.gov.au

29th November, 2011

Dear Mr Perrett

RE: Inquiry into Foetal Alcohol Spectrum Disorder

We are writing in response to your call for submissions into the incidence and prevention of foetal alcohol spectrum disorder. The portfolios of the two Ministers who referred this to you, point us towards the main issues we wish to comment on.

The Minister for Health and Ageing, the Hon Nicola Roxon MP, will be well aware that Australian Governments are currently considering the issue of food labelling, in response to the report of the Blewett Review. The Blewett Review included a recommendation on pregnancy and labelling for alcoholic beverages.

I have attached a very recent submission from the six main alcohol industries to the multi-government Labelling Review Response Secretariat on Alcoholic Beverages.

The key points of this submission are that:

- Industry opposes all five Blewett alcohol recommendations on the evidence.
- Notwithstanding this, the Drinkwise labelling initiative – focusing on behaviour change rather than health warnings – is otherwise consistent with Recs 24 & 25 and is research based.
- This approach is also consistent with the Government ‘gold book’ approach¹ and the Principles for Best Practice Regulation.

Although beer is not a preferred drinking choice for the majority of women (compared to wine or spirit based drinks) our Australian members, representing over 95% of all beer sold, have all endorsed the Drinkwise labelling initiative and are progressively implementing the labelling changes. If you care to walk from Parliament House to Liquorland in Manuka (one of the closest bottleshops) you will find that they already stock XXXX beer with appropriate pregnancy labelling on it.

We cannot comment on the outcome of this consideration, as we do not yet know it. Your closing date for submissions, December 9th, coincides with an expected “whole-of-Ministerial Council response, due to be considered in December this year²”.

¹ Taking Preventive Action, issued by Nicola Roxon, May 2010

² Australian and New Zealand Food Regulation Ministerial Council Communique, 6/5/11

The reference to you is jointly made by the Minister for Families, Housing, Community Services and Indigenous Affairs, the Hon Jenny Macklin MP. The higher incidence of FAS or FASD within specific population sub-groups points to the need for government efforts in this area to be carefully targeted to achieve the desired outcome.

To this end, and after many inquiries on this subject, we believe your Committee would greatly enhance the community dialogue on this issue if it were to chronicle the many initiatives undertaken by governments and others over the years and consider whether these were an adequate, consistent response over time.

We have had some experience with one of them, as this excerpt from our submission to an ongoing FSANZ inquiry³ attests:

“Pregnancy Lifescripts

In another targeted program, the Associated Brewers has recently sponsored the production of a *Pregnancy Lifescripts* DVD with our project partner, the Australian General Practice Network (AGPN). The DVD builds on the *Pregnancy Lifescripts* materials developed for the Australian Department of Health & Ageing. The DVDs were distributed to attendees at the AGPN’s conference in November 2007, and provide GPs with simple, evidence-based tools to assist in the provision of structured, consistent lifestyle advice on alcohol use to pre-pregnant, pregnant and breastfeeding women.

The DVD features three educational vignettes explaining effective methods to instruct clinically proven lifestyle risk management. The DVD also contains a number of PC-based features which provide printable PDF resources to assist GPs in the consultation process.

Pregnancy Lifescripts
advice for a healthy pregnancy

ALCOHOL

Just Pregnant

Second Trimester

Post Birth Check Up

▶ Watch Lifescripts Scenario

▶ Watch Lifescripts Summary

▶ Watch Lifescripts Scenario

▶ Watch Lifescripts Summary

▶ Watch Lifescripts Scenario

▶ Watch Lifescripts Summary

RESOURCES

- Alcohol Guidelines
- Alcohol Assessment Guidelines
- Alcohol Prescription
- The Alcohol Use Identification Test (WHO Full Audit)

Australian ASSOCIATED BREWERS Inc.

agpn Australian General Practice Network

INSTALL FLASH INSTALL ACROBAT CREDITS EXIT

³ Brewers Association response to FSANZ Initial Assessment Report on Application A576

This resource is an efficient and, if the program is continued, an effective means of addressing the concerns in the study cited by ALAC as a justification for the application (i.e. Payne et al., 2005) which found that “...*FAS is likely to be under-ascertained in Australia due to a lack of knowledge of FAS by health professionals*” (p.1, emphasis added).”

Finally, Committee members may be interested to know that Food Standards Australian New Zealand has commissioned detailed work in this area:

“During the year, we commissioned the National Drug Research Institute at Curtin University to review the available evidence on the effectiveness of advisory statements on labels of packaged alcohol. This analysis was requested by the Ministerial Council for FSANZ to evaluate this policy option to curb high risk drinking. We provided the Council with the conclusions of the commissioned report in May [2009]⁴. ”

This report has never been made public, although industry has requested numerous Ministers to do so. We believe it should be, even though the National Drug Research Institute is a very active member of the extreme anti-industry NAAA group⁵.

This FSANZ commissioned report may help considerably with informing your Committee’s consideration. We would support its public release to ensure that all the available evidence is on the table.

Yours sincerely

A large black rectangular redaction box covering the signature area.

Stephen Swift
Executive Director

⁴ CEO’s Review, FSANZ Annual Report 2008-09

⁵ National Alliance for Action on Alcohol