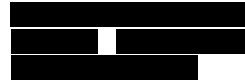




**Uniting Church in Australia**  
SYNOD OF VICTORIA AND TASMANIA

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9 December 2011

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### **Justice and International Mission Unit Submission to Inquiry Into Foetal Alcohol Spectrum Disorder**

The Justice and International Mission Unit, Synod of Victoria and Tasmania (JIM) welcomes this opportunity to make a submission to the House of Representatives Standing Committee on Social Policy and Legal Affairs 'Inquiry into Foetal Alcohol Spectrum Disorder'. This submission is narrowly focused on product warning labels about foetal alcohol spectrum disorder. The Unit acknowledges a much wider range of additional measures will also be needed, with product warning labels just one small part of what is needed.

The JIM Unit exists to engage with the church and society about issues of social justice. This work is guided by the statements and resolutions of the Uniting Church in Australia and a belief that Christian theology calls us advocate on behalf of those who are poor or marginalised. Our position is guided by basic Christian values and principles such as, "*the importance of every human being, the need for integrity in public life, the proclamation of truth and justice, ... personal dignity, and a concern for the welfare of the whole human race.*"<sup>1</sup>

The church believes life is a gift from God and all human beings are important to God. Health depends on all dimensions of an individual's life - physical, emotional, mental, cultural, social and spiritual. Health is internationally recognised as a human right under Article 12 of the *International Covenant on Economic, Social and Cultural Rights* which states the right of everyone to, "the enjoyment of the highest attainable standard of physical and mental health"<sup>2</sup>.

Uniting Church members in Victoria and Tasmania have expressed deep concerns about the harms experienced as a result of the misuse and abuse of alcohol.

The Justice and International Mission Unit does not see its role as seeking to impose a ban on alcohol on the community, but rather that the harm caused by alcohol is minimised. We also believe that communities should be empowered to make informed decisions about the supply and use of alcohol when it will impact on members of those communities.

The Unit notes the Australian Government's response to the House of Representatives Standing Committee on Aboriginal and Torres Strait Islander Affairs Report '*Doing Time – Time for Doing: Indigenous Youth in the Criminal Justice System*' released in November

<sup>1</sup> Uniting Church in Australia, *Statement to the Nation*, 1977

<sup>2</sup> Officer of the High Commission for Human Rights, *International Covenant on Economic, Social and Cultural Rights*, [http://www.unhcr.ch/html/menu3/b/a\\_ceschr.htm](http://www.unhcr.ch/html/menu3/b/a_ceschr.htm)

2011. As noted in this response<sup>3</sup>, the Unit welcomes the development and dissemination of brochures and posters highlighting the 2009 Australian Alcohol Guidelines message that for women who are pregnant or breastfeeding not drinking is the safest option. However, the Unit would support radio and television advertising to reinforce this messaging. The Unit also supports the Australian Government's development of screening tools for alcohol use during pregnancy; the development of a FASD diagnostic instrument to assist clinicians; and an Australian Institute of Health and Welfare scoping study on ways to improve FASD related data collection and reporting.

This Unit has in the past advocated for warning labels on alcohol products to warn pregnant and breastfeeding women about foetal alcohol spectrum disorder. This is one small part of the responses needed to address FASD in Australia. Research released at the start of June 2010 by the Alcohol Education and Rehabilitation Foundation showed that one in three Australian women are drinking alcohol while pregnant or breastfeeding.

Further, the survey of over 1,000 people by the Alcohol Education and Rehabilitation Foundation found that 49% of Australians admit to only having a vague knowledge of the 2009 Australian Guidelines to Reduce Health Risks from Drinking Alcohol and a further 24% had no knowledge at all.

Health groups, such as the Australian Drug Foundation and VicHealth, have called for health advisory labels on all alcohol products to better inform consumers and help prevent harms, such as foetal alcohol spectrum disorder. They point out that at the moment there is more health related information on a carton of milk than on a bottle of alcohol.

At least 43 countries already have some form of on-product labelling, with 14 of these having mandatory health labels primarily around alcohol use and pregnancy.

A study of US warning labels showed warning labels had an impact on cognitive or behavioural stages necessary for behavioural change, such as intention to change drinking patterns, having conversations about drinking and willingness to intervene with others who are seen as hazardous drinkers.<sup>4</sup>

A comprehensive review of the effects of alcohol warning labels concluded the use of warning labels did raise awareness.<sup>5</sup> In their review of the efficacy of warning labels, which looked at international evidence regarding efficacy in changing attitudes and behaviour, Wilkinson and Room (2008) argued that apart from any short-term effect, the requirement to have a warning label on a product is a "symbolic statement concerning the nature of the substance."<sup>6</sup> This can be important in helping shift the culture of harmful alcohol consumption but it is difficult to measure such an impact in the short term.

A survey by the Foundation for Alcohol Research and Education found that 66% of Australians surveyed believed that a pregnancy health warning would be effective in reducing alcohol consumption.<sup>7</sup> However, the survey did find that 85% of people already knew alcohol causes harm during pregnancy.

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<sup>3</sup> Pp. 12-14.

<sup>4</sup> T. Babor, et al., 'Alcohol: No ordinary commodity – research and public policy', (2003).

<sup>5</sup> T. Stockwell, 'A review of research into the impacts of alcohol warning labels on attitudes and behaviour', Centre for Addictions and Research of British Columbia, (2006).

<sup>6</sup> R. Room and C. Wilkinson, 'Informational and warning labels on alcohol containers, sales places and advertisements: experience internationally and evidence on effects', Report to the Drugs Policy and Service Branch, Department of Human Services, Victorian Government, (2008).

<sup>7</sup> Foundation for Alcohol Research and Education, 'Alcohol Health Warning Labels: Attitudes and Perceptions', (2011), p. 2.

The Australian Chronic Disease Prevention Alliance has recommended strict guidelines regarding the wording, format, legibility, size and placement of warning labels. Labels need to be tested with consumers to ensure they are understood, especially by people with low literacy or who speak languages other than English. Health information and warning labels should be complemented with signs, posters and other media at alcohol retail venues, especially in licensed premises where people are served drinks in glasses and are not exposed to product labels.

The Unit strongly urges the Committee to recommend health warnings be placed on all alcohol products to warn women of the risks of foetal alcohol spectrum disorder. The Unit believes the existing voluntary labels used by parts of the alcohol industry are an inadequate warning, lacking sufficient detail of the risks.

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