

Friday, 19 August 2011

## NCID response to “Labelling Logic” - Report to the COAG Review of Food Labelling Law and Policy

NCID notes with significant concern that Australia is one of only a very few developed countries that does not carry any health warnings on the most widely and heavily consumed drug in the general community, alcohol.

NCID urges the COAG Review to mandate the necessity for all alcohol to carry clear messages regarding the significant health hazards associated with the consumption of alcohol particularly during pregnancy.

“To promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent human dignity.”

UN Convention on the Rights  
of Persons with Disabilities

Significant consumption of alcohol during pregnancy has been proven to cause major foetal damage:

*Prenatal alcohol exposure, and the resulting FASD, is recognized as the commonest preventable cause of intellectual disability. (K.D.O'Malley, 2007)*

Foetal Alcohol Spectrum Disorder (FASD) is a term that describes a wide range of effects that can occur in an individual who was exposed to alcohol in pregnancy. (Chudley C. C., Fetal alcohol spectrum disorder: Canadian Guidelines for Diagnosis, 2005) Foetal Alcohol Spectrum Disorders occur as a result of the effect of alcohol on the foetus. **Alcohol freely crosses the placenta and can damage any developing foetal cells.** The foetal brain is vulnerable to damage during the entire nine months of development. The changes in brain development are permanent. The effects can include physical, behavioural, emotional and cognitive disabilities that last throughout the lifespan.

**It has been recognised in Canada that FASD is a leading cause of preventable brain damage and developmental delay. Canada provides significant education support to children affected by FASD and has clear criteria for diagnosis and identification for support.**

Alcohol consumption during pregnancy has been shown in Australia to potentially affect :

- FAS-(1 to 3 per 1000 live births) = 265 to 797 births.
- FASD-(1 per 100 live births) = 2659 births.

The draft National Health and Medical Research Council Australian alcohol guidelines for low-risk drinking (2008), recommend that **no drinking in pregnancy** is the safest option.

NCID supports the Alcohol Education and Rehabilitation Foundation (AERF) who are calling for a Government mandated health warning label system. Any labelling

needs to carry visually clear messages which are unambiguous and clearly state the health hazards associated with alcohol consumption.

AER Foundation details the requirements of the proposed health warning label regime for alcohol products, including:

- That there be at least five health warning labels, including one specifically relating to drinking during pregnancy,
- Health warning labels should comprise both text and symbol. The labels need to be placed consistently on the front of the product and clearly distinguishable from the rest of the label,
- They should be implemented as part of a comprehensive public education regime, and
- The labels should be evaluated and refreshed at least every three years.

NCID strongly supports the statements made by AMA President, Dr Steve Hambleton that warning labels should be mandatory on alcohol products, especially as a deterrent to drinking when pregnant.

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*"The labels recently introduced voluntarily by the alcohol industry do not go far enough.*

*They represent a soft approach on health labelling.*

*Warning people, especially young people, about the potential harms of alcohol cannot be left in the hands of an industry motivated by increasing its sales and profits." (Official Wire 18/8/11)*

Protecting the future lives of many generations of young Australians is too important to leave this issue to the Alcohol Industry to address in any manner they wish.

All Governments have a clearly unambiguous role in protecting not only future generations but also in providing the resources and supports needed to provide those Australians affected by FASD with the assistance they need to fulfil their potential.

*The National Council on Intellectual Disability (NCID) was established over 50 years ago by parents and friends, in an endeavour to improve the quality of life of people with intellectual disability and to fill the need for national unity and information.*

*The Council is the recognised national peak body with the single focus on intellectual disability, ie, our actions and priorities centre on issues that affect the lives of people with intellectual disability and their families. Our mission is to work to make the Australian community one in which people with intellectual disability are involved and accepted as equal participating members.*

*NCID has over 5,000 members representing all 8 States and Territories. In addition to having people with disability on its Board, NCID receives policy advice from Our Voice. Our Voice is a committee the membership of which is exclusively people with intellectual disability representing all States and Territories.*

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