



Overview report: voluntary pregnancy warning labelling on alcohol products in New Zealand

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1 Introduction

This report has been prepared for the Australia New Zealand Ministerial Forum on Food Regulation, to provide Ministers with an overview of the industry uptake and consumer awareness and understanding of the voluntary initiative to provide pregnancy warning labels on packaged alcohol products in New Zealand. It summarises key findings of research undertaken, and gives a description of current voluntary industry initiatives, and other health sector related initiatives to reduce the impact of drinking alcohol in pregnancy. This overview does not assess the economic impacts of the voluntary labelling initiatives, and it also does not consider uptake or awareness of point of sale information for unpackaged products.

1.1.1 Annexes to this overview report

In late 2016, a quantitative self-reported industry survey was undertaken by MPI with help from alcohol industry peak bodies. In addition, MPI undertook a field survey. The results of these pieces of research are available in the MPI report 'Evaluation of voluntary pregnancy warning labelling on alcohol products in New Zealand'. This is available as Annex 1.

In 2016, the Health Promotion Agency (the Government agency responsible for health promotion, including preventing and reducing alcohol related harm in New Zealand) commissioned Colmar Brunton to undertake research on consumer awareness and understanding of alcohol pregnancy warning labels. The research report was published on the Health Promotion Agency's website in October 2016. This is available at Annex 2 or can be accessed at <http://www.hpa.org.nz/research-library/research-publications/consumer-awareness-and-understanding-of-alcohol-pregnancy-warning-labels>.

1.1.2 Background to initiative and progress so far

In 2009, an independent review of Food Labelling Law and Policy was commissioned by Australian and New Zealand Ministers responsible for food safety. This review was wide-ranging and put forward 61 recommendations, including: *'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 for unpackaged alcoholic beverages, as support for ongoing broader community education.'*

Ministers responded to this recommendation in 2011 by providing the alcohol industry a two-year period to adopt voluntary initiatives for pregnancy labelling on alcohol products before considering regulation. An evaluation of the voluntary scheme was undertaken in 2014 and the Australia New Zealand Ministerial Forum on Food Regulation agreed in June 2014 to extend the existing trial on voluntary uptake of pregnancy health warnings on packaged alcohol product labels until June 2016, and to evaluate the voluntary approach again at that time.

The Health Promotion Agency has a current application to Food Standards Australia New Zealand to require a health advisory label on alcoholic beverage containers advising of the risks of consuming alcohol when planning to become pregnant and during pregnancy. The application was made in 2006 by the Health Promotion Agency's predecessor organisation, the Alcohol Advisory Council of New Zealand. The application was paused pending consideration of the recommendation of the Labelling Review.

2 Current scene

2.1 NEW ZEALAND'S FETAL ALCOHOL SPECTRUM DISORDER ACTION PLAN

In considering labelling with warnings for pregnant women (or those who plan to become pregnant), it is important to note that labelling alone will not change behaviour and reduce the number of pregnancies affected by alcohol. The New Zealand's Government's *Taking Action on Fetal Alcohol Spectrum Disorder: 2016-2019 Action Plan* is key in this regard.

The Action Plan was launched in August 2016 and states that drinking alcohol during pregnancy can compromise the health of both the mother and her unborn baby. It increases the risk of a number of pregnancy complications and can cause permanent damage to the brain and body of the developing foetus. There is no known safe amount of alcohol consumption during pregnancy. The Action Plan aims to create a more effective, equitable and collaborative approach to fetal alcohol spectrum disorder. It is a cross-agency commitment designed to build on work already underway by Government and has four focus areas: prevention; early identification and assessment; support for affected people and their families; and improving New Zealand's fetal alcohol evidence base.

The part on prevention includes developing and disseminating clear, unambiguous, and consistent messages to increase the community's awareness of the risks of drinking alcohol during pregnancy. The Action Plan references the current trans-Tasman voluntary arrangement which encourages industry to voluntarily provide warning labels on all packaged alcoholic products, and notes that the voluntary arrangement will be subject to a review. This report forms part of the review.

The Action Plan outlines that the Government expects industry to continue to increase the number of alcohol products that have messaging such as a pictogram (a figure of a pregnant woman holding a glass of wine with a line through it) and the Government will work alongside industry to ensure that consumers understand that the pictogram means: 'stop drinking alcohol if you could be pregnant, are pregnant, or are trying to get pregnant. There is no known safe level of alcohol consumption during pregnancy'. This includes through opportunities at point of sale, and through health promotion and education.

The Action Plan can be found at the New Zealand Ministry of Health's website at the following link: <http://www.health.govt.nz/publication/taking-action-fetal-alcohol-spectrum-disorder-2016-2019-action-plan>

2.2 OTHER RELATED HEALTH SECTOR INITIATIVES

The Health Promotion Agency has a mandate to reduce alcohol-related harm in New Zealand. It has an alcohol-free pregnancies work programme with an overarching aim that women who are pregnant, trying to get pregnant, or could be pregnant, are aware of the risks of drinking, motivated and able to choose not to drink and are supported in this choice by physical, social and policy environments and services. The Health Promotion Agency delivers the 'Don't Know? Don't Drink' marketing campaign that encourages women to stop drinking alcohol if there is any chance they could be pregnant. This campaign is mostly social media based as it is aimed at young women. Resources and tools have been and are continuing to be developed for health professionals to support them to talk with women about not drinking alcohol during pregnancy and the risks of drinking alcohol.

The Health Promotion Agency has also issued an advice statement on drinking and alcohol which has been endorsed by the Ministry of Health and 17 other health sector agencies.¹ The advice statement is to ‘stop drinking alcohol if you could be pregnant, are pregnant or are trying to get pregnant. There is no known safe level of alcohol consumption during pregnancy’.

2.3 CURRENT VOLUNTARY INDUSTRY INITIATIVES

Industry bodies in New Zealand regularly communicate with their members on the importance of providing warnings on labels.

Wine

New Zealand Winegrowers is the national organisation for New Zealand’s grape growing and wine making sector. It covers all New Zealand wineries and has approximately 850 grower members and 700 winery members. This covers approximately two thirds of wine for sale in New Zealand, with the remainder being imported. New Zealand Winegrowers produce a labelling guide for use by its members, which is a very well used resource and available to members electronically on a members-only section of their website. They include information on labelling by country, and in the New Zealand section information is included on a health advisory for pregnant women. This encourages wineries to promote safe and responsible consumption on their wine labels, and recommends that members include a pregnancy health advisory statement on the labels of wine sold in New Zealand, in either the form of a written message, or a pictogram. It also states that the Government is monitoring voluntary uptake and is expecting to see an increase.

The World Wide Trade Agreement (WWTG) (<http://ita.doc.gov/td/ocg/wwtg.htm>) is an agreement signed between the eight wine producing states of Argentina, Australia, Canada, Chile, Georgia, New Zealand, South Africa and the United States. Under its 2007 Agreement on requirements for wine labelling, all WWTG participants have agreed to a ‘single field of vision’ approach to wine labelling, and have agreed to not restrict the placement of either mandatory or voluntary information on a wine bottle.

Beer and cider

The Brewers Association represents the two major breweries (DB Breweries and Lion New Zealand) who brew over 87% of beer and close to 100% of cider for sale in New Zealand. The Brewers Association actively encourages and is committed to placing pregnancy warning labels on beer and cider products. Wording and pictograms are available from the Association.

The Brewers Guild represents all breweries, including the independent smaller breweries and its independent members have approximately 10% market share. The Brewers Guild has currently no targets or plans to push independent members to voluntarily implement pregnancy warning labelling across their membership.

Spirits

Spirits New Zealand represents over 95% of spirit industry interests (including ready-to-drink RTDs) in New Zealand, including most imports. Members include Diageo, Pernod Ricard and Independent Liquor. Spirits New Zealand members are actively encouraged to voluntarily provide pregnancy warning messages.

¹ This statement, and a list of agencies that endorse it, and other information about the Health Promotion Agency’s work can be found at www.alcohol.org.nz/alcohol-its-effects/alcohol-and-pregnancy/what-you-need-to-know

Cheers website

The Brewers Association, New Zealand Winegrowers and Spirits New Zealand fund the Cheers! website (www.cheers.org.nz) which is an industry initiative, set up to promote responsible drinking. This has downloadable tools and resources for industry, including template wording and pictograms, for use on labels.

International labelling commitments

The Beer, Wine and Spirits Producers' Commitments is made up of leading global producers who have made a collective commitment to reduce harmful drinking. They have committed to a standard set of easily understood symbols or equivalent words to discourage drinking and driving; consumption by those under-age; and consumption by pregnant women. Signatories include Asahi, Diageo, Heineken, Kirin, Pernod Ricard, which all own and import product into New Zealand. More information can be found at:

<http://www.producerscommitments.org/commitments/providing-consumer-information-and-responsible-product-innovation/>

2.3.1 Types of pregnancy warning labels used by industry

The types of pregnancy warning labels used by industry voluntarily in New Zealand include a pictogram of a figure of a pregnant woman holding a glass of wine with a line through it, a warning text such as *It's safest not to drink while pregnant*, or a combination of the two. See the report '*Evaluation of voluntary pregnancy warning labelling on alcohol products in New Zealand*' in Annex 1 for more detail.

2.4 TYPES OF ALCOHOLIC DRINKS CONSUMED BY WOMEN OF CHILD BEARING AGE IN NEW ZEALAND

The Health Promotion Agency, as part of its statutory function, regularly researches and reports on alcohol use in New Zealand. Its annual Attitudes and Behaviour towards Alcohol Survey (ABAS) provides information on the self-reported types of alcoholic beverages consumed on the last drinking occasion. Combined data from the 2013/14, 2014/15, 2015/16 ABAS show the most common type of drink consumed on the last occasion by young women aged 18 to 24 years was spirits (52%), followed by ready-to-drinks (41%). Women in all other age groups, including age 25 to 44 years, most commonly reported drinking wine.

It is, therefore, important to see these types of warnings on the drinks most commonly consumed by women of child bearing age – wine, spirits and ready-to-drink (RTD) spirits.

3 Key findings of the research

Three pieces of research were undertaken, as well as an analysis of pregnancy warning label questions included in a national alcohol survey. The key findings from each are detailed below.

3.1 QUANTITATIVE INDUSTRY SURVEY

The self-reported industry survey completed in 2014 to evaluate the uptake of voluntary pregnancy warning labelling showed that at that time, by sales volume approximately half of packaged alcoholic beverages available in New Zealand carried a form of pregnancy warning labelling. Producers who provided pregnancy warning labelling almost universally used the pictogram (figure of a pregnant woman holding a glass of wine with a line through it) or slogan of the Australian Drinkwise programme at that time ("*It's safest not to drink while pregnant*").

A questionnaire was sent from MPI to alcohol peak bodies (the Brewers Association of Australia and New Zealand, New Zealand Winegrowers and Spirits New Zealand) in September 2016 who contacted their members and provided MPI with a collated response for their respective categories.

The responses received for the industry survey cover over 90 percent of the market share per volume for beer, cider and spirits. The information shows that the largest uptake of pregnancy warning labels was for cider (reported to be on 100 percent of labels); followed by spirits (ready to drink, 88 percent); beer (87 percent); and spirits (straight, 82 percent). In addition 92 percent of wine representing two-thirds of the market share per volume was reported to display a pregnancy warning label.

The results from this survey showed that voluntary uptake has increased since 2014 and the majority of packaged alcohol products across all alcohol categories were reported to have adopted some form of pregnancy warning.

Information from the industry response did not break down the type of pregnancy warning label used in enough detail to report quantitatively.

3.1.1 Reasons given by industry for not undertaking labelling

In 2014, the online industry survey included a question as to why a pregnancy warning label had not been adopted or why there is no intent to do so. The main reasons given were:

- Only have mandatory information on labels (not legally obliged);
- It is well known that alcohol should not be consumed while pregnant;
- Using up previous label stock.

In the 2016 industry survey, a question was included as to why a pregnancy warning label had not been adopted. Reasons given for not undertaking the labelling voluntarily, or for not seeing the labelling on products were:

- Only complying with mandatory requirements;
- Not officially endorsed by one industry body;
- Time lag in labels, particularly for those which have a considerable shelf life (e.g. spirits).

3.2 MPI FIELD SURVEY

In October and November 2016, MPI undertook a field survey of labels of products on the shelves at that time at two retail outlets, a large supermarket and a retail liquor store in Wellington. The main purpose of this survey was to see the ways in which the pregnancy warning labelling was being applied to the products when used, and to provide data, particularly on the type, positioning and legibility of the warning labels to complement the information from the quantitative industry survey. Therefore venues were specifically chosen to get a wide range of products rather than to sample the biggest selling labels with largest market share. The sample also included imported product (which the industry survey did not). The final sample (once duplicates were removed) consisted of 297 products (181 wines, 66 beers, 12 ciders, 30 spirits and eight RTDs).

Overall, across all product categories, the pictogram (a figure of a pregnant woman holding a wine glass with a line through the picture) was the most commonly used type of pregnancy warning, with more than half of the pregnancy warning labels for beer, cider, wine and spirits surveyed using this. The field survey showed a lot of variation in the type of pregnancy

warning messages found on product labels, including in colour, size and design. For ready-to-drink spirits, text was the most commonly sighted form of pregnancy warning.

The survey also showed that the majority of beer and cider, half of spirits and ready-to-drinks (RTDs) and a little under half of wine on the shelves of the retail outlets surveyed had a pregnancy warning of some form on their label. The field survey found that the percentages of individual products per category with a pregnancy warning message were lower than the market share by volume based percentages reported in the industry survey, however the figures are not able to be compared. The field survey did not account for market share of the products but rather aimed to capture a wide range of different products. The difference can also be partly explained by the time lag in getting product onto shelves (particularly for spirits and wine) and that the sample in the field survey was small and not nationally representative.

3.3 HEALTH PROMOTION AGENCY RESEARCH INTO CONSUMER AWARENESS

In 2014, the industry survey undertaken by MPI did not attempt to quantify the impact of pregnancy warning labelling. This meant there were no questions pertaining to the visibility and readability of pregnancy warning labelling, nor levels of consumer awareness.

To help address this gap and to help understand consumer awareness in New Zealand, and knowledge about pregnancy warning labels on alcohol, the Health Promotion Agency commissioned research involving an online survey; and also included questions about pregnancy warning labels on alcohol in its 2015/16 Attitudes and Behaviour towards Alcohol Survey. Results from these are both explained further below.

3.3.1 Health Promotion Agency commissioned research into consumer awareness of current voluntary initiatives

The Health Promotion Agency commissioned Colmar Brunton to undertake consumer research to examine the extent of consumer awareness of current voluntary pregnancy warning labelling initiatives. The research report was published on the Health Promotion Agency's website in October 2016 and can be accessed here: <http://www.hpa.org.nz/research-library/research-publications/consumer-awareness-and-understanding-of-alcohol-pregnancy-warning-labels>

The target population for this research was adult New Zealanders, with a particular interest in women aged 18-34 years, and women with children under 15 years. The research focused on:

- recall and awareness of current voluntary approaches (pictograms or warning messages), both unprompted and prompted (i.e. both with and without being shown an example of a label);
- reading and understanding of current pictograms and warning messages, and whether this has any effect on raising awareness of the link between drinking and harm to an unborn baby.

The key conclusions from the research were that:

- few consumers (5%) recall pregnancy warning labels without prompting, but with visual prompting more than four in ten (44%) recalled at least one of the labels tested;
- Overall, most of those who recall the warning labels have a clear understanding that they mean to not drink alcohol while pregnant or possibly pregnant.

The research showed the following percentages of overall respondents have a 'top of mind' association with the message to not drink while pregnant:

- 80% for the pictogram;
- 54% for the text *'It is safest not to drink while pregnant'*; and
- 76% for the text *'Don't drink pregnant'*.

Many have been prompted by the labels to consider the risks of drinking alcohol while pregnant. The general message to not drink when pregnant is most strongly portrayed by the pictogram. A key finding was that consumers wanted a clearer link between drinking while pregnant and the harm to the unborn child, which respondents considered would be best achieved through the addition of text to the pictogram. The research did not specifically test this, although the research did test pictogram colours. When shown pictograms in a range of colours, most respondents (94%) associated the colour red with a warning.

The finding is that about half (54%) of respondents correctly interpreted the commonly used labelling text *'It is safest not to drink while pregnant'* to mean you should not drink any alcohol during pregnancy. A small number (8% of all respondents and 14% of young women) considered it meant you can drink while pregnant, but it is safer not to. The researchers concluded given the Drinkwise text could be misinterpreted, it was not recommended as the ideal text to accompany a pictogram and that further research to test possible options is required. The research highlights the important role of pregnancy health warnings on alcoholic beverages in raising awareness of the risks and harms of drinking while pregnant, or planning a pregnancy.

3.3.2 Questions regarding pregnancy warning labels in the 2015/16 Attitudes and Behaviour towards Alcohol Survey

Analysis of the questions in the Health Promotion Agency's national 2015/16 Attitudes and Behaviour toward Alcohol Survey of 4000 New Zealanders aged 15 years found that:

- the majority of respondents (78%) said 'yes' when asked whether messages or symbols about not drinking alcohol during pregnancy should be on all alcohol products
- support for such labels was higher among:
 - females
 - young and older adults (15 to 24-year-olds and those aged 45+ years, compared with 25 to 34-year-olds)
 - Pacific and Asian respondents (compared with those identifying as European/Other)
 - those with a relatively low household income (<\$50,000 compared with >\$100,000 in the previous 12 months).
- around a quarter (24%) of women aged 18 to 44 years reported seeing messages or symbols on alcohol products about drinking while pregnant in the past year
- fewer older women (35 to 44-year-olds compared with 18 to 24-year-olds) and Pacific or Asian women (compared with European/Other) had seen such messages or symbols
- the warning label most commonly seen by women aged 18 to 44 years was a 'picture of a pregnant lady drinking with a cross/line through' (34% of those who had seen a warning label in the past year)
- women aged 18 to 44 years most commonly interpreted the message from the labels they saw to be 'do not drink while pregnant' (74% of those who had seen a warning label in the past year).

The research report with these findings was published on the Health Promotion Agency's website in June 2017 and can be accessed here: <http://www.hpa.org.nz/research-library/research-publications/attitudes-to-and-awareness-of-alcohol-pregnancy-warning-labels>

4 Discussion

4.1 UPTAKE

The results of the self-reported industry survey indicate that there has been significant uptake of voluntary pregnancy warning labels on packaged alcohol products and there are reported to be more products in the marketplace with these types of warnings than in 2014. Industry are generally complying voluntarily, and the warnings are on a majority of packaged products, although there is still some variation between product types. Consumers also see the warnings on a number of imported products, as a number of products on New Zealand shelves are owned by international companies which have signed up to international labelling commitments, which include advisories for pregnant women. In addition, some countries (such as the United States and South Africa) have mandatory warning requirements for pregnant women on alcoholic products.

Given that research shows women of child-bearing age predominantly drink wine, spirits and ready-to-drink spirits, it is important that the messages are seen on these products. In addition, the prospect of mandatory requirements has not been discounted. Therefore, most industry are motivated to provide the messaging voluntarily. However, it is unlikely there will ever be 100% voluntary labelling, as a minority of small producers have indicated that they would not provide the messaging unless it became mandatory. In addition, one industry body has not endorsed the voluntary scheme.

The recommendation from the Labelling Review also referenced information at ‘point of sale for unpackaged alcoholic beverages’ (i.e. sold in licensed premises), and this is referenced in the Fetal Alcohol Spectrum Disorder Action Plan also. This was not specifically reviewed by this project so there is no data available.

4.2 MESSAGE AWARENESS AND UNDERSTANDING

The results from consumer research show that unprompted recall of messages is low but when the messages are recalled, they mostly deliver the message to not drink while pregnant or possibly pregnant. The results from the national 2015/16 Attitudes and Behaviour toward Alcohol Survey show that around a quarter of women aged 18 to 44 years reported seeing these messages in the past year. The warning label most commonly seen by these women was the pictogram, and the women most commonly interpreted the message from the labels they saw to be ‘do not drink while pregnant’.

The consumer research also shows low unprompted recall of pregnancy warning labels but with visual prompting more consumers recalled the labels. Overall, most of those respondents who recall the warning labels have a clear understanding that they mean to not drink alcohol while pregnant or possibly pregnant. Many respondents have been prompted by the labels to consider the risks of drinking alcohol while pregnant, although a small number consider you can still drink while pregnant, but it is safer not to. However, the research concluded that consumers want an even clearer link between drinking while pregnant and the harm to the unborn child on labels, which researchers considered would be best achieved through the addition of text to the pictogram. The research also found that the pictogram is viewed as most effective in being likely to prompt someone not to drink while pregnant, and to prompt people to talk about the risks with others.

In considering labelling with warnings for pregnant women (or those who plan to become pregnant), it is important to note that labelling alone will not change behaviour and reduce the number of pregnancies affected by alcohol. New Zealand’s Fetal Alcohol Spectrum Disorder

Action Plan and associated activities are key in this regard. The Action Plan will be formally reviewed in three years' time.

4.3 MESSAGE CONSISTENCY

The field survey showed a lot of variation in the type of pregnancy warning messages found on product labels. This is not unexpected due to not having a mandatory standard, but it does mean that it is not consistent with the expectation of the Government's Fetal Alcohol Spectrum Disorder Action Plan, which is to disseminate clear, unambiguous and consistent messages. Overall, across all product categories, the pictogram was the most commonly used type of pregnancy warning. The field survey showed a lot of variation in the type, colour and size of the messaging used, both for text and for the use of the pictogram.

Observations by MPI were that the pictogram stands out most when contrasting colours are used for the line through the pregnant figure, or if in monotone, the line through the pregnant figure is separated from the figure. This variation would be eliminated or reduced by having a mandatory scheme, or guidance material for the voluntary scheme.

5 Conclusions

The main conclusions are:

- The results of the self-reported industry survey of New Zealand producers indicate that there has been substantial increase of voluntary pregnancy warning labels on packaged alcohol products and there are reported to be more products in the marketplace with these types of warnings than in 2014.
- The results of the industry survey indicate that the alcohol industry are generally complying voluntarily, and the warnings are on a majority of packaged products, although there is still some variation between product types.
- However, it is unlikely there will ever be 100% voluntary labelling, as a minority of small producers have indicated that they would not provide the messaging unless it became mandatory. In addition, imported product (apart from Australia) is not subject to this voluntary arrangement. Whilst it is known from the field survey that there are pregnancy warning labels on some imported product, it is not on all imported product.
- The consumer research shows that few consumers recall pregnancy warning labels without visual prompting but overall, most of those respondents who recall the warning labels have a clear understanding that they mean to not drink alcohol while pregnant or possibly pregnant.
- The research concluded that consumers want an even clearer link between drinking while pregnant and the harm to the unborn child on a label, which researchers considered would be best achieved through the addition of text to the pictogram.
- The field survey showed a lot of variation in the type, colour, size and design of pregnancy warning messages found on product labels. This is not unexpected due to not having a mandatory standard.
- This variation could be eliminated or reduced by having a mandatory scheme, or guidance material for the voluntary scheme may also reduce variation.
- Point of sale information for unpackaged alcoholic products was not evaluated, but consideration should be given in future as to whether this should be included as part of any mandatory scheme, or whether guidance material should be provided to retailers.