



Evaluation of voluntary pregnancy warning labelling on alcohol products in New Zealand

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1 Executive summary

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 by providing the alcohol industry a two-year period (until December 2013) to adopt voluntary initiatives for pregnancy warning labelling on alcohol products before considering regulation. A further two-year period was granted in June 2014.

This report *Evaluation of voluntary pregnancy warning labelling on alcohol products in New Zealand* evaluates the coverage and the type of pregnancy warning labels used on packaged alcohol products in October/November 2016. For this purpose two complementary pieces of research were conducted; a quantitative industry survey conducted by MPI with help from alcohol peak bodies in New Zealand, and a field survey conducted by MPI at a supermarket and a liquor store in Wellington.

The responses received for the industry survey cover over 90 percent of the New Zealand market by volume for beer, cider and spirits and two-thirds of the market for wine. Approximately one-third of wine is imported and was not captured in the survey. The high response rate for all alcohol categories indicates that the results provide a reliable picture of the overall New Zealand alcohol industry’s response to the trial granted for voluntary uptake of pregnancy warning labelling on alcohol products.

The majority of alcoholic beverage producers across all alcohol categories were reported in the industry survey to have adopted some form of pregnancy warning on their labels by October 2016. The coverage for market share by volume ranged from 82 percent for spirits to close to 100 percent for cider. The increase in the adoption of pregnancy warning labelling on packaged alcohol products has been substantial as data from a survey conducted in 2014 showed that at the time, approximately half of alcoholic beverages available in New Zealand carried a form of pregnancy warning labelling.

The MPI 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 that were reported in the industry survey.

The field survey also showed that there was a lot of variation in the type of pregnancy warning messages found on the product labels, as well as the colour and size of the messaging used. The pictogram (a figure of a pregnant woman holding a wine glass with a line through it) was the most commonly sighted pregnancy warning used, with more than half of the pregnancy warning labels for beer, cider, wine and spirits surveyed in the field survey using it (of the products that had adopted some form of warning labelling).

The results of the self-reported industry survey indicate that the alcohol industry are generally complying voluntarily, and the warnings are on the majority of packaged products.

2 Introduction and background

In 2009, the then Australia and New Zealand Food Regulation Ministerial Council commissioned a review of Food Labelling Law and Policy – the Labelling Logic Review of Food Labelling Law and Policy 2011 (the Review). The Review includes a recommendation: *‘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.’*

In its response to the Review (December 2011), the Legislative and Governance Forum on Food Regulation (now known as the Australia New Zealand Ministerial Forum on Food Regulation (the Forum) stated its intention to provide the alcohol industry a two-year period (until December 2013) to adopt voluntary initiatives for pregnancy warning labelling on packaged alcohol products before considering regulation.

In New Zealand the extent of the voluntary pregnancy warning labelling was evaluated at the end of the two-year period by means of an online survey conducted by the Ministry for Primary Industries (MPI) in conjunction with the alcohol industry peak bodies. In light of the results of this survey, and those of a similar Australian survey, the Forum agreed in June 2014 to extend the existing trial on voluntary uptake of pregnancy health warnings on alcohol product labels until June 2016, and to evaluate the voluntary approach again at that time.

In October 2015, MPI undertook an interim survey to gauge the level of voluntary uptake of pregnancy warning labels across the industry. This was done in preparation for a full evaluation to be conducted at the end of the second two-year trial period in 2016. In part, it helped inform the development actions in the New Zealand Government’s Towards Action on the Fetal Alcohol Spectrum Disorder: 2016-2019 Action Plan, published in August 2016. Part of this Action Plan focuses on prevention, and disseminating clear, unambiguous and consistent messages to increase awareness of the risks of drinking during pregnancy. The Action Plan states the Government supports the use of a consistent pictogram and will work alongside industry to ensure that consumers understand that this symbol 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.’* The Government also expects industry to increase the number of alcohol products with the messaging, and will work in partnership with industry to do so.

This evaluation reports on the status and the progress made on the voluntary uptake of pregnancy warning labels on packaged alcohol products in New Zealand by the end of the second two-year period granted by the Forum.

3 Methodology

MPI, with help from alcohol peak bodies in New Zealand, aimed to evaluate the uptake of voluntary pregnancy warning labelling to determine the coverage (by market share) and the type of pregnancy warning labels used on packaged alcohol products at the end of the second two-year trial period granted by the Forum in June 2014. For this purpose two complementary pieces of research were conducted by MPI: a quantitative industry survey and a field survey.

3.1 QUANTITATIVE INDUSTRY SURVEY

A quantitative industry survey was conducted in September and October 2016. MPI sent a questionnaire (see Appendix 1) to the three alcohol industry peak bodies in New Zealand, namely the Brewers Association of Australia and New Zealand, New Zealand Winegrowers and Spirits New Zealand. The three peak bodies in turn sent the questionnaire to their members, and responses were collated by the peak bodies before sending to MPI.

This approach was chosen as accurate and timely market share data is highly commercially sensitive in nature and the peak bodies were able to provide MPI with this without compromising their members' individual commercial sensitivities and ensured a good response rate. Due to the highly commercially sensitive nature of this data, MPI chose to report the findings by category and market share.

The Brewers Association sent the questionnaire to their members (DB Breweries and Lion New Zealand, who brew 87 percent of beer for sale on the domestic market). They also contacted the Brewers Guild (whose members include independent smaller breweries and are responsible for approximately 10% of the beer for sale on the domestic market) and collated the responses for the domestic beer and cider category as a whole. Responses were received from the majority of the members of these industry bodies together representing approximately 90 percent of the total beer and nearly 100 percent of the cider market in New Zealand.

New Zealand Winegrowers has approximately 850 grower members and 700 winery members (covering approximately two-thirds of wine for sale in New Zealand, with the remainder being imported). New Zealand Winegrowers sent the questionnaire to their five largest wine producers which represented 58 percent of the total wine market in New Zealand at the time. In addition New Zealand Winegrowers sent the questionnaire to its smaller members as well and received responses from 22 further wine producers; representing together approximately an additional 10 percent of wine available for sale domestically. The responses received represent in total approximately 68 percent of the wine available for sale in New Zealand, and close to 100 percent of wines produced in New Zealand.

Spirits New Zealand sent the questionnaire to its members who represent 95 percent of the spirits market in New Zealand. All members responded to the survey.

Due to the fact that the alcohol peak bodies represent their members only, the survey was not able to capture imported wines, beer and cider, nor parallel imports of spirits. Of wine approximately one-third is imported, whilst for beer imports account for approximately two percent. Parallel imports of spirits account for approximately five percent of the spirits available in New Zealand.

The questionnaire included questions on market share (by volume), the proportion of products carrying a pregnancy warning label, and what types of messages are used on labels in the New Zealand market. The questionnaire also included questions on whether in cases where products did not carry a pregnancy warning label there was a volume-based target for applying the warning label to and the timeframe, and the reasons why a warning label had not been adopted or why there was no intent to do so.

The results of the 2016 quantitative industry survey are compared to the results of an interim quantitative industry survey conducted in October 2015 to determine the progress made by industry during the second two-year trial period to adopt voluntary initiatives for pregnancy labelling on alcohol. In addition to the above, an online survey conducted in 2014 was undertaken using quite different methodology and set of questions, so the data are not directly comparable to the industry surveys of 2015 and 2016. As the 2015 interim survey was undertaken to test the questionnaire developed in preparation for the 2016 industry survey, and therefore the same questionnaire was used, the results of these two surveys are comparable.

3.2 MPI FIELD SURVEY

In addition to the quantitative industry survey, in late October / early November 2016, MPI undertook a field survey of labels of products on the shelves at the time. Retailers who stock a wide range of products were specifically chosen for inclusion in the survey. A random sample of alcoholic beverage labels from products on the shelf at one large supermarket and one retail liquor outlet in Wellington was surveyed. The products surveyed were not representative of the whole New Zealand market, nor was market share taken into account. Every 10th stock keeping unit (SKU) product on the shelf was assessed for whether a warning regarding consumption during pregnancy was present, and if so in what form. This resulted in a total of 307 products being assessed. If the same SKU product was selected in the supermarket and the liquor outlet, the duplicates were removed from the total sample. The sample included domestically produced products as well as imported products which were all analysed as one sample. There were nine duplicates of wine and one of beer. The final sample of 297 product SKUs consisted of 181 wines, 66 beers, 12 ciders, 30 spirits and eight RTDs.

The field survey aimed to provide data, particularly on the type, positioning and legibility of the warning labels to complement the information from the quantitative industry survey. Despite also looking at how many of the products had a pregnancy warning on the label, the field survey was not designed to validate the results of the quantitative industry survey, due to the fact that the sample was not a nationally representative sample, accounting for market share by volume, but instead trying to capture a wide range of different products.

The different forms of pregnancy warning messages sighted in the field survey were captured under the following categories:

1. Pictogram (a figure of a pregnant woman holding a wine glass with a line through it)
2. Warning text (such as *It's safest not to drink while pregnant*)
3. Combination of a pictogram and text
4. Other

4 Results and analysis

4.1 QUANTITATIVE INDUSTRY SURVEY

The majority of alcoholic beverage producers across all alcohol categories were reported in the quantitative industry survey to have adopted some form of pregnancy warning on their product labels by October 2016 (Table 1).

Table 1: Respondents' market share and percentage of products reported to carry a pregnancy warning label in the quantitative industry survey (2016)

Category of alcohol	Percentage of market share (by volume) covered by responses	Percentage of products that were reported to carry some form of warning
Beer	approx. 90%	87%
Cider	99.7%	100%
Wine	68%	92%*
Spirits (straight)	95%	82%
Spirits (ready-to-drink)	95%	88%

* Results include wine produced by the five largest producers that represent 58% of the wine market. An additional 10% of the market was covered by the further 22 responses but it was not possible to determine the percentage of these products carrying a warning.

4.1.1 Beer and cider

All cider and the vast majority of beer available on the market by September/October 2016 were reported to carry a form of pregnancy warning label (Table 1). For beer, the two largest breweries (DB Breweries and Lion New Zealand) who brew 87 percent of the beer for sale in NZ, by volume had a pregnancy warning on 100 percent of their products. The Brewers Guild members that responded represented approximately two percent of the beer market by volume, and two-thirds of those had a pregnancy warning on the label of their products. The main reason given for not using a pregnancy warning was that it had not been officially endorsed by the Brewers Guild Executives. The Brewers Guild does not currently have plans to implement pregnancy warning labelling across their membership. Approximately two percent of beer on sale in New Zealand is imported and this survey was not able to capture them. In addition a member of the Brewers Guild, responsible for approximately eight percent of the beer market by volume, did not respond to the survey.

The type of warnings used were reported to be either a pictogram or wording and present on individual bottles. In the case of multipacks packed in sleeves or boxes the warning was reported to be on outer packaging as well.

4.1.2 Wine

Of the wine produced by the five largest producers (who represented 58 percent of the wine market by volume), 92 percent were reported to carry a warning regarding consumption of alcohol during pregnancy (Table 1). Three out of these five producers had adopted this warning on 100 percent of their products, one indicated that they would have 100 percent coverage by December 2016, and one explained they were aiming to make further labelling changes for the 2016 vintage. Of the additional 22 smaller wine producers that responded to the survey (together representing an additional 10 percent of the wine market), nine already used warning labelling and four were committed to doing so in the next vintages as labels are updated. Due to the way the results were compiled, it was not possible to determine the market share by volume of the nine smaller producers that reported to have a warning on their

products, thus Table 1 column 2 reports only the percentage of products carrying a warning label from the five largest producers.

New Zealand Winegrowers have indicated that pregnancy warning labelling should appear on more of the 2017 vintages, and the New Zealand Winegrowers labelling guide clearly recommends that members place a written pregnancy warning or pictogram on their labels. However, some of the New Zealand Winegrowers members, particularly smaller wineries (producing under 200,000 litres) who in their response to the industry survey did not express an intention to apply a pregnancy label, noted that it was not a legal requirement.

The type of warning used on wine was reported to be either a pictogram or a text message. When present, the warning was reported to be on the back label of the bottle or on the cask label; and therefore visible at point of purchase.

New Zealand Winegrowers represent New Zealand-produced wines only. Approximately one-third of wine sold in New Zealand is imported, which is why it was not possible to capture the entire market by means of surveying local industry bodies. The majority of imported wine comes from Australia. We do not know the percentage of imported wine that is labelled with a pregnancy warning, but we do know that the results from the Australian evaluation in 2014 showed that the majority of wines sold in Australia had a warning label (Siggins Miller 2014).

4.1.3 Spirits – straight and ready-to-drink

The survey covered 95 percent of the spirits market in New Zealand. The majority of the products (82 percent of straight spirits and 88 percent of Ready to Drink products (RTDs)), were reported to already have adopted some type of pregnancy warning (Table 1). There was variation within the spirits and RTD categories between the different types of products ranging from 67 percent of adoption (gin) to over 95 percent of adoption (whiskey and cognac). For RTDs the range was from 71 percent (rum based) to 96 percent (bourbon based) having a pregnancy warning.

The spirits industry have a self-regulated target for the adoption of pregnancy warning labels on 100% of their products by April 2017. This applies to both straight spirits and RTDs. It is worth noting that for straight spirits there is often a considerable lag effect between product being imported or produced versus what is available for sale. This is because of the considerable shelf life of some SKUs.

The type of messaging used varied between product categories and was always on the back label of the bottle or container and, depending on the product. The pregnancy warning was reported to be on outer packaging and therefore visible at point of sale.

4.1.4 Progress made with voluntary uptake of pregnancy warning labelling

The data from the survey conducted in 2014 are not directly comparable to the data from the 2016 industry survey, but nevertheless showed that at the time approximately half of alcoholic beverages available in New Zealand carried a form of pregnancy warning labelling. Producers who provided pregnancy warning labelling almost universally used the pictogram (a 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*).

The interim quantitative industry survey found that by October 2015, the majority of packaged alcoholic products available for sale in New Zealand contained a pregnancy warning label, either in the form of a pictogram or text (Table 2).

Table 2: Respondents’ market share and percentage of products reported to carry a pregnancy warning label in the interim quantitative industry survey (2015)

Category of alcohol	Percentage of market share (by volume) covered by responses	Percentage of products that were reported to carry some form of warning
Beer	approx. 90%	87%
Cider	99.7%	91%
Wine	62%	82%
Spirits (straight)	95%	55%
Spirits (ready-to-drink)	95%	67%

The 2015 interim survey questionnaire included a question on whether the industry had a volume-based target for implementation, including the timeframe. For beer the indication was that 98 percent of the market would be 97.5 percent compliant by June 2016 and for cider 99.7 percent of the market would be 98 percent compliant by the same date. For spirits and RTDs it was indicated that 90-95 percent would carry a pregnancy warning label by July 2016.

The results from the 2016 quantitative industry survey (Table 1) showed that the voluntary uptake had steadily increased (Figure 1), confirming that the uptake projections from the 2015 interim quantitative industry survey had been largely implemented. For beer, the uptake percentage was lower than the target indicated in 2015, but this may be explained by the fact that one significant producer (responsible for approximately eight percent of the beer market by volume) did not respond to the survey in 2016.

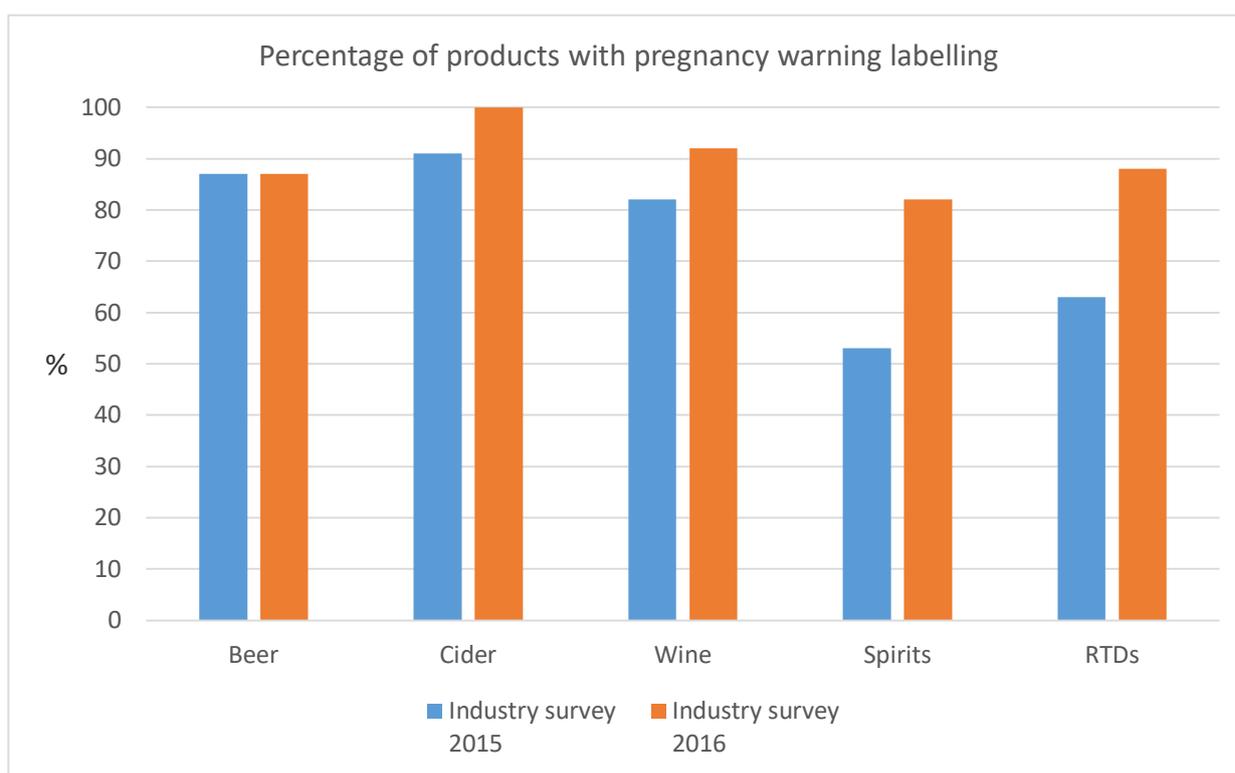


Figure 1: Uptake of voluntary pregnancy warning labelling per category in 2015 and 2016

Note: the market share of the alcohol categories is not comparable (see Table 3).

Apart from wine, the surveys from both 2015 and 2016 captured over 90 percent of the market volume per category of alcohol (Table 3). For wine, the majority of domestically produced wine was captured. In the 2015 survey, only the five largest producers of wine with a combined market share of 62 percent at the time were surveyed. In 2016 the market share of the five largest producers was 58 percent and in addition a response was received from 22 smaller producers with a combined market share of 10 percent. The high response rate for all categories indicates that the results of the surveys conducted in 2015 and 2016 provide a reliable picture of the overall New Zealand alcohol industry’s response to the trial granted for voluntary uptake of pregnancy warning labelling on alcohol products. However, an important limitation of the surveys is that they did not include data on pregnancy warning labels on parallel imports of spirits or imported beer, cider and wine, which for the wine category account for one-third of wine per volume for sale in New Zealand.

Table 3: Percentage of estimated market coverage (by volume) of the 2015 and 2016 quantitative industry surveys

Category of alcohol	2015	2016
Beer	approx. 90%	approx. 90%
Cider	99.7%	99.7%
Wine	62%	68%
Spirits (straight)	95%	95%
Spirits (ready-to-drink)	95%	95%

4.1.5 Type of pregnancy warning on label

Information from the industry responses did not break down the type of pregnancy warning label used in enough detail to report that quantitatively by market share. See qualitative results from the field survey (4.2.1 Type of Label) for an indication of the type of warning labels used on different products.

4.2 MPI FIELD SURVEY

The field survey showed that the majority of beer and cider, half of spirit and RTD and a little under half of wine SKUs on the shelves of the retail outlets surveyed had a pregnancy warning of some form on their label (Figure 2).

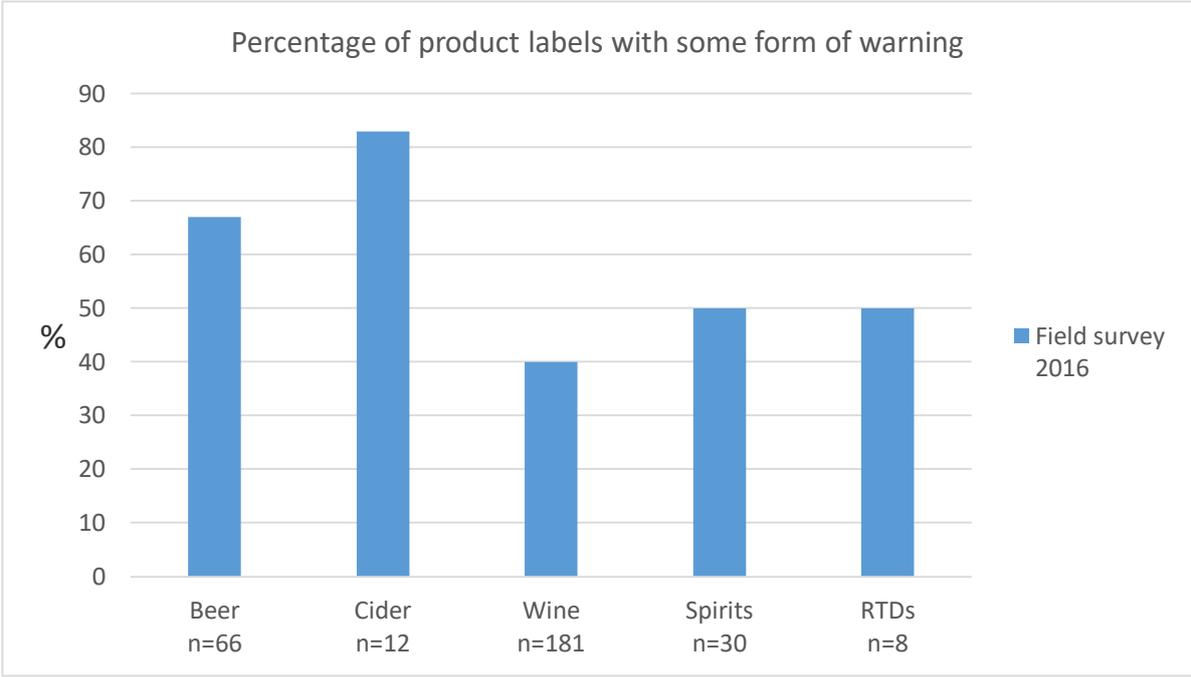


Figure 2: Percentage of product labels per category with some form of warning in the field survey (2016)

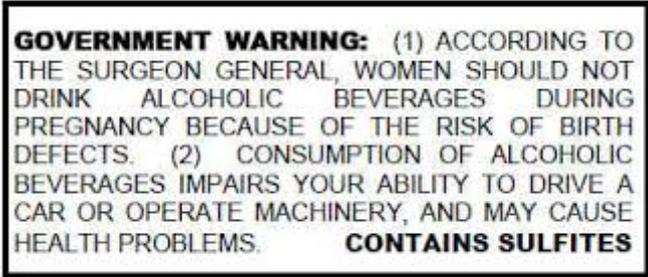
The field survey found that the percentages of individual products per category carrying a pregnancy warning label were lower than the market share by volume based percentages that were reported in the quantitative survey undertaken with peak industry bodies. The field survey surveyed stock on shelf at one point in time (October - November 2016), rather than stock being bottled at that time. According to the industry survey, many producers of spirits and wines in particular, experience a significant time lag in getting stock onto shelves post bottling/labelling, and older wine and spirit products will be present for retail sale for significantly longer than beer and cider. The field survey had only a small sample size (see Figure 2 for number of samples per product category) taken from two retail outlets in one city and was thus not representative of the national marketplace. It also included imported products not captured by the industry survey.

4.2.1 Type of label

The field survey showed a lot of variation in the type of pregnancy warning messages found on the product labels, as well as the colour and size of the messaging used (Table 4).

The pictogram was the most commonly sighted pregnancy warning used, with more than half of the pregnancy warning labels for beer, cider, wine and spirits surveyed in the field survey using this (of the products that had adopted some form of pregnancy warning labelling) (Figure 3). The field survey showed a lot of variation in the type, colour and size of the pictogram used. Observations from the field survey 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 (Table 4). For RTDs, text was the most commonly sighted form of pregnancy warning.

Table 4: Example of types of messages sighted in the field survey

<p>Pictogram</p>	
<p>Warning text</p>	
<p>Combination of pictogram and text</p>	
<p>Other</p>	<p>US warning:</p> 

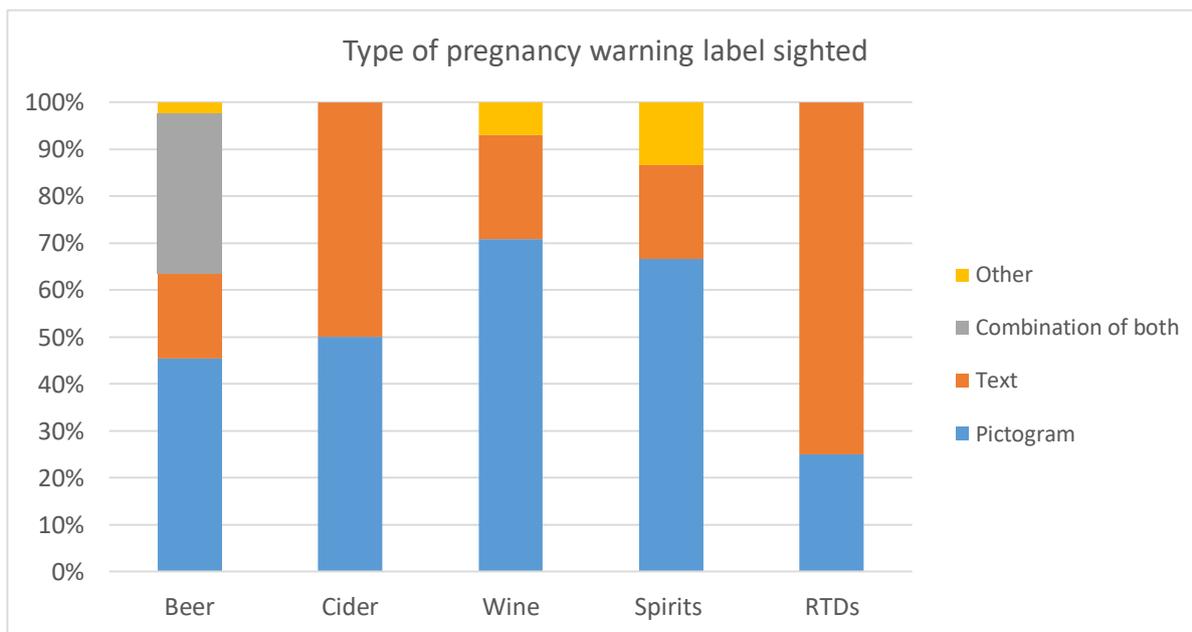


Figure 3: Type of pregnancy warning label sighted per category (for those products using warning labels)

Pregnancy warning text was also commonly used in all alcohol categories. There were in total four different pregnancy warning texts sighted in the field survey. By far the most common one, found on 49 products, was the text *“It is safest not to drink while pregnant”* (Figure 4). The official US Government warning was the second most common warning text. In total eight products, which originated from the US, Mexico, Japan and France, had this on the label.

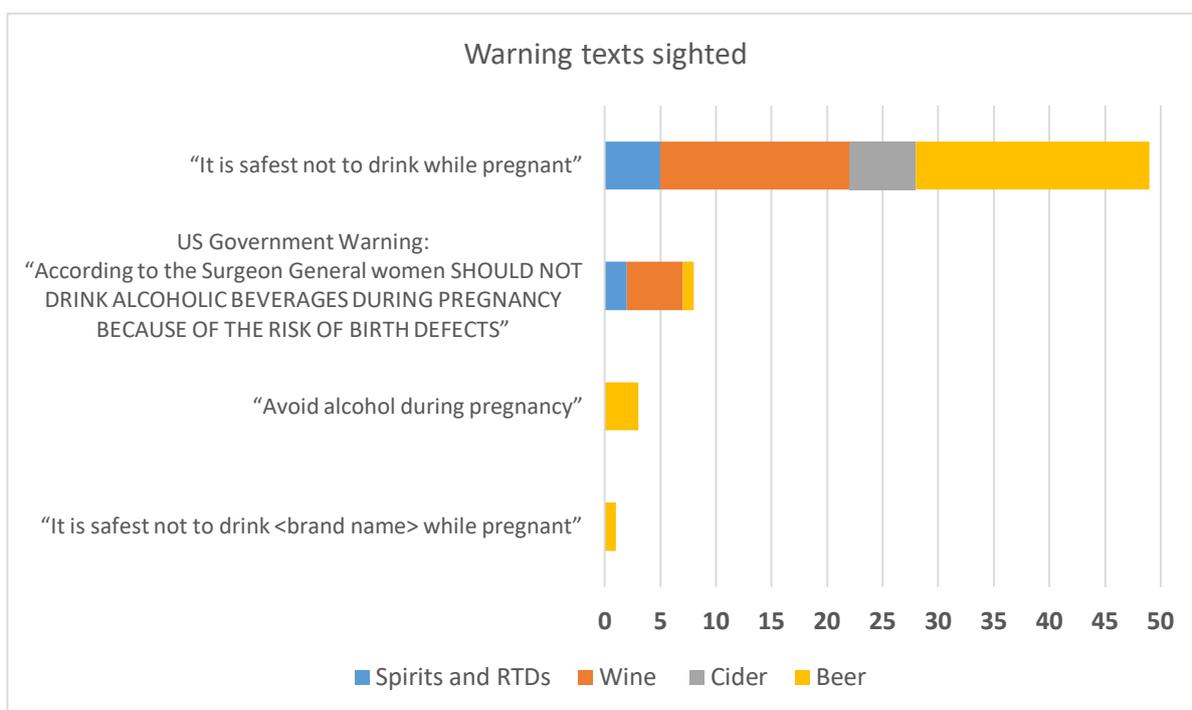


Figure 4: The number of different types of warning texts sighted

The pregnancy warning, when used, was predominantly found on the back of the packaging with some individual beer packages having it on the side and some on the bottom of a box or pack. Large boxes of beer and cider sometimes had no warning labels visible at purchase, but the individual bottles inside did contain warnings on their labels. Where sleeves were used (e.g. for six packs), the individual bottle labels were sometimes still visible at purchase.

5 Conclusions

- Since 2014 the adoption of pregnancy warning labelling on packaged alcohol products available in New Zealand has substantially increased.
- The majority of alcoholic beverage producers across all categories reported to have adopted some form of pregnancy warning on their labels in the survey conducted by MPI in October 2016.
- The reason given by a small minority of small wine producers for not undertaking the pregnancy warning labelling was that they were only complying with mandatory requirements. The reason given by some small beer manufacturers was that the labelling is not officially endorsed by the Brewers Guild Executive.
- The MPI 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 per category as reported in the industry survey.
- There was a lot of variation in the type of pregnancy warning messages found on the product labels. The field survey confirmed, that overall, across all product categories, the pictogram was the most commonly used type of pregnancy warning. The field survey also showed a lot of variation in the type, colour and size of the pictogram used.
- There has been significant uptake of voluntary pregnancy warning labels on pack. The results of the self-reported industry survey indicate that the alcohol industry are generally complying voluntarily, and the warnings are on the majority of products.

6 References

Siggins Miller (2014). Evaluation of the voluntary labelling initiative to place pregnancy health warnings on alcohol products. Final report.

Available at: <http://foodregulation.gov.au/internet/fr/publishing.nsf/Content/Pregnancy-Warnings-on-Alcohol-Labels>

Appendix 1. Questionnaire to alcohol peak bodies in New Zealand

Category	Proportion of category (by volume) represented by category	Pregnancy label on all retail volume of this category at present? (yes or no)	If no, what proportion of your product carries a pregnancy label for this category?	If no, do you have a target for implementation? What proportion of the entire volume do you intend to apply the label to, and by when?	If not, why?	What messages are you using on labels (if at all)? (eg pictogram, text wording)	Are the messages (if used at all) on externally visible packaging in the retail setting? (eg on outer bottle label or outer sleeve/box)?