

Children in Scotland

every child - every childhood

Department of Health Consultation on options for improving information on the labels of alcoholic drinks to support consumers to make healthier choices in the UK

Children in Scotland welcomes this opportunity to submit evidence to this UK Department of Health consultation on options for improving information on the labels of alcoholic drinks.

As alcohol labelling is a devolved issue this response refers to Scotland, but the points raised are relevant to all parts of the United Kingdom. This consultation also comes as the Scottish Parliament considers its approach to the various issues contained in the Alcohol Etc (Scotland) Bill 2009. In the evidence submitted by Children in Scotland on this Bill, we urged the Scottish Government and Parliament to enact legislation that will have real effects on reducing alcohol consumption and its related problems.

Token gestures are not adequate given the severity of alcohol-related problems and costs across the UK. Clear, easy-to-read warnings on alcohol labels could have a real impact on at least *some* people.

The presented options of this consultation are to 'do nothing and continue with the current voluntary agreement', 'Renew and strengthen the existing self regulatory agreement' or 'Introduce a mandatory requirement on labelling'. As the consultation document acknowledges that industry compliance with the current agreement have been very low, the first option should be discarded.

We would, therefore, support either strongly strengthening the current self – regulatory agreement (perhaps with a caveat that if progress is not made, that mandatory labeling will be introduced) or to proceed with compulsory labeling. The self-regulatory arrangement could be strengthened with the inclusion of a review period (for example, after one year) with the understanding that if a level of labeling compliance (for example, 75%) has not been reached, this would trigger an automatic shift to mandatory labeling.

At a minimum, the label should include information on the number of units contained in the drink, recommended daily limits, and a message on responsible drinking and strongly discouraging drinking while pregnant or trying to conceive. The latter is particularly encouraged as one measure to increase awareness of, and attempt to prevent foetal alcohol harm. The message 'avoid alcohol if pregnant or trying to conceive' or 'consuming alcohol while pregnant or trying to conceive may damage your baby' or the 'French

logo' (pregnant women with a wine glass with a line through it) are recommended inclusions on alcohol labels. In addition to this, we would also support further messages encouraging consumers to seek support and advice - for example, a link to Drinkaware.

Foetal Alcohol Harm

As Scotland's Chief Medical Officer, Harry Burns, recently acknowledged, "*prenatal exposure to alcohol is the leading cause of brain damage and developmental delay amongst children in industrialised countries*". Any messages on responsible and safe drinking behaviour should remind those who are pregnant (or trying to become pregnant) of the potential risk they are taking when they consume alcohol. No 100% 'safe' level exists, therefore abstinence is encouraged.

Thousands of children and adults in Scotland and throughout the UK are affected by foetal alcohol syndrome or foetal alcohol spectrum disorder. The problems caused by exposure to alcohol in utero are irreversible and can lead to serious lifelong health, educational and behaviour difficulties. Having strong consistent messages on alcohol products in Scotland is one way of increasing awareness of, and altering attitudes towards, the risks of drinking in pregnancy. Labelling all alcohol products can help create a greater societal awareness of these risks.

Much as labels on cigarettes and other tobacco products warn of the potential dangers to the self and to others; alcohol products and their manufacturers should warn of possible health risks posed by consuming their products.

Children in Scotland is Scotland's national agency for organisations and professionals working with and for children, young people and their families. It exists to identify and promote the interests of children and their families and to ensure that policies and services and other provisions are of the highest possible quality and are able to meet the needs of a diverse society. Children in Scotland represents more than 450 members, including 90% of Scottish Local Authorities, all major voluntary, statutory and private children's agencies, professional organisations, as well as many other smaller community groups and children's services. It is linked with similar agencies in other parts of the UK and Europe.

The work of Children in Scotland encompasses extensive information, policy, research and practice development programmes. The agency works closely with MSPs, the Scottish Government, local authorities and practitioners. It also services groups such as the Cross Party Parliamentary Group on Children and Young People (with YouthLink Scotland). In addition, Children in Scotland hosts Enquire - the national advice service for additional support for learning, and Resolve: ASL, Scotland's largest independent education mediation service.