

“There’s many a slip between cup and lip” As there is between package and sale

Claire Wilkinson¹

¹*Drug Policy Modelling Program, Social Policy Research Centre, UNSW Sydney, Australia*

A discussion paper on the use of warning labels on alcohol containers and advertisements, as well as at point of sale, was my first significant task upon joining the team at the Centre for Alcohol Policy Research, Melbourne, in 2007. The context, beyond the team: Food Standards Australia New Zealand (FSANZ), was actively looking into the feasibility of mandating a warning about the risks of consuming alcohol when planning to become pregnant and during pregnancy¹. “If FSANZ amends the code to require labeling”, we wrote, “the debate will move to one of determining the content, wording and format of the required label (Wilkinson & Room²: 430). Pettigrew et al.³ highlight that we neglected to address considerations of monitoring implementation. Little did we envisage that it would take 16 years to mandate an alcohol pregnancy warning label.

Compared to research on alcohol label design and content, e.g.⁴ there is strikingly little on label implementation and industry compliance. Pettigrew et al.³ begin to fill this gap by outlining an approach to monitoring alcohol industry use of health messaging. Of particular value, their study provides a baseline measure of alcohol industry compliance with the 2023 mandated pregnancy warning label.

Perhaps the key point is the pregnancy warning label mandate applied from the date of packaging rather than date of sale. Existing stock was not addressed in the regulation. Thus, there was significant slippage. Therein the key to Pettigrew et al.’s³ finding that 37% of alcohol beverages available during the June–November 2023 data collection period did not display the mandatory pregnancy warning (required of products labelled from 1 August 2023).

A second point of note was the wide use of a non-DrinkWise voluntary health message: one in four (26%) products displayed such a message, including warnings about the risks of drink driving or alcohol use amongst those under 18 years of age. The nature and motivation behind these messages warrants further research given they are currently beyond government regulation and their potential to shape consumer perceptions of products.

Lastly, the study raises implications for online alcohol sales. How can compliance with labelling law be monitored as alcohol is increasingly sold online? A minimum of five photographs were taken of each in-store alcohol product to ensure all label elements were captured. On average, how many photos of beverages available online were there? The study suggests the importance of prescribing specific forms of providing information in regulation governing online alcohol availability.

In 2007 there were calls for a mandated alcohol pregnancy warning label. In 2025, there are growing calls for an alcohol health warning on cancer, e.g.^{5–7} Given what we know about alcohol industry interference and delaying tactics, would it be unrealistic to hope that this time around we could achieve a mandated cancer label in five years? And more concisely, identify what we require: that compliance with health label package requirements be a precondition for sale by any means of distribution.

Conflicts of interest

Dr Wilkinson is a member of the WHO Technical Advisory Group on Alcohol Labelling.

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e-mail: c.wilkinson@unsw.edu.au.

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