

Never Never Distilling Co. Pty Ltd
31 West Thebarton Rd
Thebarton SA 5031



Attn: Food Standards Australia and New Zealand
SUBMISSION: P1050 - Pregnancy warning labels on alcoholic beverages

Via email: submissions@foodstandards.gov.au

To Whom It May Concern

Never Never is two years old and rapidly growing in to one of South Australia's **premier** gin distilleries. We currently employ 9 staff on payroll and many casuals and contractors who rely upon us for their livelihoods. We will shortly open a new distillery door in McLaren Vale creating further job opportunities.

Your proposal to mandate a "Health Warning" Label is highly concerning for our business and would be financially and operationally harmful. As a small spirits producer, we take pride in how our product is presented to appeal to our customers. We have won **World's Best Classic Gin at the World Gin Awards 2019** in London and were voted 3rd Highest Trending Global Gin by Drinks International 2019, as well as many other trophies and gold medals.

Some of our products presently carry the DrinkWise Australia pregnancy advice. While this decision incurred a great deal of expense at the time, it has been well received by our customers and team.

We find it extraordinary that Food Standards ANZ (FSANZ) are proposing a very significant and costly label change when some small changes to what is being proposed would have a similar impact at much lower cost.

We presently have 7 SKUs and growing. We estimate it will cost a total of \$30,000 to comply with this proposal. We simply **don't** have that money set aside for this additional cost. Even if we did have that money available, we would hope to use it to invest in team development, our distillery door, tourism and export markets.

We implore you to see common sense and make the following changes to the FSANZ proposal:

1. Rather than mandate colours, introduce contrast colour guidelines the same as is required for other mandatory information
2. **Change 'HEALTH WARNING' to 'PREGNANCY WARNING'**. Health warning is misleading and alarming to our customers
3. Increase the threshold for vessels to only be required to display the pictogram from 200mL to 400mL, with the full label displayed on secondary (6 or 4-pack) and tertiary (carton) packaging. The full label is simply too large to be accommodated on many labels on containers up to 400mL.

These changes are sympathetic to our overall label design, **don't** impose costs through additional colours, **don't** steal as much valuable label real estate, and **don't** make all our customers think they are drinking a harmful substance.

Yours sincerely 