



EdgemillGroup

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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

I am the Managing Director of Edgemill Group Pty Ltd. We are a family owned business with over forty years of experience in retail, wholesale and manufacturing and produce premium spirit and wine portfolio to the Australian and international market.

Your proposal to mandate a "Health Warning" Label is an expense to our business that we feel is unnecessary considering our entire spirit and wine range already displays the DrinkWise Australia pregnancy advice in a logo format. While this decision incurred a great deal of expense at the time, it has been well received by my customers and has been aesthetically incorporated into our product branding.

Below is an example of our 50ml label design showing the pregnancy warning logo. This logo is present on our entire portfolio.



As a small, growing business with 18 employees and an office in China, I take great pride in how my product is presented to appeal to my customers. They have won numerous international awards including China, New York, San Francisco, the UK and here in Australia.

I find it puzzling 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.

Our portfolio presently has 33 x Spirit and 26 x Wine SKUs. I estimate it will cost me a total of \$100,000 to comply with this proposal. I simply don't have that money set aside for this additional cost. Even if I did have that money available, I would hope to use it to invest in new barrels/ tank storage / marketing / team development /distillery door/ tourism/export / a new product / etc.]

We request that common sense prevails and request for the following changes be made to the FSANZ proposal:

1. Rather than mandate colours, introduce contrast colour guidelines the same as is required for other mandatory information and/or the pregnancy logo itself.
2. Change 'HEALTH WARNING' to 'PREGNANCY WARNING'. Health warning is misleading and alarming to my 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 my overall label design, don't impose costs through additional colours, don't steal as much valuable label real estate, and don't make all my customers think they are drinking a harmful substance.

Yours sincerely