

AMBLESIDE

DISTILLERS

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ABN 95 612 879 099

Liquor Licence 51211379

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

We are a family owned Distillery in the regional township of Hahndorf in South Australia. Our business has been manufacturing spirits for the wholesale and retail markets for the past couple of years. We also operate a Tasting Bar from our site which attracts over 30,000 visitors a year and therefore have the pleasure of meeting with many thousands of people who consume our locally made spirits.

Since opening two years ago, we have created 11 new jobs in our business and we have made significant contributions to a number of local charities. We believe we are good and responsible citizens who operate a successful business as a part of our local community and the wider Australian community. We absolutely take the responsible service of alcohol to our community seriously.

Because of this, we have already invested in implementing the DrinkWise Australia voluntary labelling initiative into our bottle label design. This label design has a clear message and uses the previously and widely used DrinkWise.org.au branding. The already recognised DrinkWise.org.au brand is also already aligned to other 'drink wise' messages.

The proposal to mandate a "Health Warning" Label that is three colours – black, white, and pantone red 485, for producers that already use four or six colours on their labels represents a major constraint to creativity, and major redesigns of existing products.

We support responsible alcohol labelling laws but having such a restrictive and very expensive to produce warning, we believe is unwarranted.

We have invested heavily in our branding and being a small regionally based producer, label production is a bit part of our production cost. Having 3 colours imposed on an already complex label will add to the cost of printing and re-design work already invested in. A red pantone is also very restrictive when a product label is such an important part of our marketing.

As a small family business, the cost to produce the proposed mandated labels would mean we would be required to redirect funds that have been allocated to grow our business, creating jobs and adding to the manufacturing and tourism sectors in our State.

Some small changes to what is being proposed would still send a clear message, but at a much lower cost to those that are investing in a flourishing up and coming growing industry.

We request the following be considered;

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', sending a clearer message or using simple pictogram currently promoted by DrinkWise.org.au that crosses any potential language barriers
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.

Yours sincerely