

21st October 2019

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 owner of a dedicated gluten free brewery based in Dromana Victoria. We are only a very small brewery (but growing fast) that opened in December 2018. We employ 13 local people to help us make, sell and deliver our beer all over Australia.

Your proposal to mandate a "Health Warning" Label is extremely concerning to a small business like us. We have only recently completed our packaging design (both cans and cartons) at a cost of \$15,000 – which is an enormous cost for a small business like us.

As a small craft producer, I take great pride in how my product is presented to appeal to my customers. We are only new, but we have already received a silver medal and three bronze medals for our beer at the recent Independent Brewers Association awards – and we look forward to improving on that next year!

My beer presently carries the DrinkWise Australia pictogram. While this decision incurred a great deal of expense at the time, it has been well received by my customers and team, and we are very proud to help support this worthwhile initiative.

I 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.

I presently have 4 SKUs. I estimate it will cost me a total of \$25,000 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 use it to invest in new tanks and marketing.

I 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 – but most carton packaging can handle only two colours without having to even more expensive technology.
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 – if used) and/or tertiary (carton) packaging. The full label is simply too large to be accommodated on many labels on containers up to 400mL.

These changes, whilst still costly to my business as it will require complete carton package 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