

All Inn Brewing Co  
189 Elliott Rd, Banyo QLD 4014

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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](mailto:submissions@foodstandards.gov.au)

To Whom It May Concern

We are a small craft brewery in Banyo, Brisbane. We have approximately 9 employees, some of which are students and rely on us to pay their way through their university studies and others who work more hours more regularly to support their families and aspirations. We are also a part of a thriving local community for whom we act as a social hub, we also do alot of charity for the community raising money for various local charities and providing a lot of support and donations to help the community where possible.

Your proposal to mandate a "Health Warning" Label is very alarming as since 2017 we have been packaging our beer and have had to change our labels on quite a number of occasions to satisfy new policies and labelling updates from different governing bodies. This may seem insignificant to big business and corporations however to smaller breweries like ourselves, this can be threatening to our future operation, especially when they happen so often without consideration for us, our business, our employees and our community.

As a small craft beer producer, I take great pride in how my product is presented to appeal to my customers. I have won various silver medals for our packaging design in the IBA awards and been commended on our attractive packaging which also satisfies all legislation.

My beer packaging presently carries the DrinkWise advice as well as a no drinking while pregnant 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 strong believers in responsible consumption of our product in all cases, which in the case of pregnancies means NON-consumption, hence we display the pictogram on our packaging.

It is very troubling that Food Standards ANZ (FSANZ) are proposing to inflict such a large amount of economic damage to so many small Australian businesses, when most of us are already displaying a pregnancy warning on our packaging and with a few small adjustments to the proposition, we could avoid incurring business threatening expenses, which would have just as much impact as the proposed labelling change, yet not put our business at risk.

We currently run approximately 8 SKUs in packaging. We estimate it would cost us approximately \$32,400 to make the changes which includes (for 8 SKUs) reworking artwork of packaging, paying artwork setup fees and paying for plates if we had to comply with this proposal as it currently is. There would also be extra ongoing costs as it would require us to use more colours on our prints than we currently do, significantly increasing the cost of packaging. That is a large amount of money which we do not have available to make such changes and even if we did, it would be much better

spent on new tanks and new equipment as well as marketing, brand assets, more employees etc (all of which we need).

We request you instead think about the impact such changes would have on small business, communities and employees of craft breweries all around Australia 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 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 applicable) 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