

COLD  BREW  
**MR•BLACK**  
• COFFEE LIQUOR •

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

To whom it may concern.

I am the managing founder of Mr Black Spirits Pty Ltd. We're producers and distillers of the world's best coffee liqueur, with facilities in Sydney, Erina and a new warehouse in Mt Kurring-gai. We directly employ 32 staff, the majority of which are located in Sydney and the Central Coast.

I write today to address the exceptionally concerning update to the "health warning" applied to liquor packaging.

We are a high-quality producer of spirits who take enormous pride in both how our product tastes, and how it looks. We have won numerous awards for our product, including countless design awards, including BEST IN CLASS from the Australian Graphic Design Association, and the coveted GOLD MEDAL at the Dieline Awards in Boston, USA.

As a small, growing business, we find it preposterous that DrinkWise would propose such changes, when smaller changes could be adopted at a significantly lower cost.

Our printing method does not allow for the printing prescribed by DrinkWise. We have over 35 SKU's of product, with \$300,000 of labels on hand at any one point. Changing this standard, with the prescribed colours and methodology would cost us in excess of \$100,000, which is not viable for a company such as ours.

We have made enormous sacrifices as a business, forgoing personal remuneration as we invest in people, machinery and marketing to build a sustainable business.

I ask of you to please consider the following amendments to the proposal:

- Rather than mandate colours, introduce contrast colour guidelines the same as is required for other mandatory information
- Change 'HEALTH WARNING' to 'PREGNANCY WARNING'. Health warning is misleading and alarming to my customers
- Increase the threshold for vessels to only be required to display the pictogram from 200mL to 500mL, 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 500mL.

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.

Please do not hesitate to contact me if you have any questions.

Mr Black Spirits Pty Ltd