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26/10/19

451 Tschampions rd.

**Att: 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

I am a small one person operation manufacturing artisan/craft spirits in the Yarra Valley in Victoria.

As a startup business in the boutique spirits industry, the impact of the proposed labeling does not only apply to my business directly but also to local suppliers of produce.

The increases in excise every 6 months already puts a large Burden on the business and I see this recommendation as only an additional burden that does not need to be.

The additional cost to my business cannot be passed onto the consumer due to the level of imported product pricing.

I find this proposal perplexing from Food Standards ANZ (FSANZ) by proposing a very significant and costly label change, when some changes to what is being proposed have a similar impact but a far lower cost.

Presently I have six products in my range with an additional six in the pipeline. I simply do not have the financial capability or budget for this additional cost. Modification of labels to comply and website and marketing materials etc will set me back an additional \$25,000 +GST, let alone the waste of labels that are preprinted.

Monies budgeted have not been set aside for such changes but have been set aside for barrel investment, bottles, marketing/tourism, R&D and most importantly a larger premises so I can employ staff and have an open door so I can grow my business.

Please review the proposal and consider the impact not just on the distillery but also the local community, farmers and suppliers.

With monies tied up it impacts future employment for locals into my business and the time frame for our business to utilise products from our local community.

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This proposal for me far extends from the proposal impacts and SKU's that have been printed.

1. Rather than mandate colours, introduce colour guidelines the same as other mandatory information
2. Change "HEALTH WARNING to "PREGNANCY WARNING". Health warning is misleading and dangerous as it implies they are drinking harmful substance.
3. Increase the threshold for vessels to only be required to display pictogram for 200ml to 400ml, with the full label displayed on secondary (6 or 4 pack) and tertiary (carton) packaging. The full label is simply too long to accommodate on many labels on containers up to 400ml.

These changes are I can alter to my overall label design. Please do not impose costs through additional colours.

Most of my spaces on label are already a premium for my Branding and marketing needs.

The wordings please reconsider as I don't want my customers thinking they are drinking a harmful substance.

Yours Sincerely

Owner/Distiller

Dusty Barrel Distillery

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