

South Australian Spirit Producers Association  
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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

The South Australian Spirit Producers Association (SASPA) is a 10 month old association established to:

- Promote South Australia as a leading spirits & liqueurs region;
- Represent distillers and producers with state and local government;
- Advance the interests of industry including in relation to local events;
- Support the Australian Distillers Association in its national objectives; and
- Protect the integrity of the industry.

We currently represent 16 members with over 160 employees and a rapidly growing industry. Many people rely on employment by our members for their livelihoods.

**Your proposal to mandate a “Health Warning” Label** is highly concerning for our members and would be financially and operationally harmful to them. As a small spirits producers, we take pride in how our product is presented to appeal to our customers. Our members have won several global awards and represent the highest quality in global spirits categories.

Some of members presently carry the DrinkWise Australia pregnancy advice on their products. While these decisions incurred a great deal of expense at the time, they have been well received by customers.

We 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.

We estimate it will cost our members collectively \$500,000 to comply with this proposal. As an emerging industry comprising small businesses, our members simply **don't** have that money set aside for this additional cost. Even if we did have that money available, we would hope to use it to invest in team and market development.

We 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
2. **Change 'HEALTH WARNING' to 'PREGNANCY WARNING'.** Health warning is misleading and alarming to our 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) 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 our overall label design, **don't** impose costs through additional colours, **don't** steal as much valuable label real estate, and **don't** make all our customers think they are drinking a harmful substance.

Yours sincerely