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ROOKWOOD BREWING AND DISTILLING

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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

To Whom It May Concern

I am a small brewer and distiller located in inner Melbourne (Yarraville), and in the setup phase of my business.

Your proposal to mandate a "Health Warning" Label is of great concern to me for several reasons. It will have a significant impact on the visual appeal of my product, while not providing any information to the consumer that is not otherwise very well known.

As a small and boutique spirits producer, I take great pride in how my product is presented to appeal to my customers. I have already designed and printed labels using the DrinkWise voluntary labelling and see no reason to expand the requirements of this in such a draconian manner.

The colour restriction is particularly onerous, as the mandated use of pantone red 485 will stifle creativity and potentially open up a minefield of trademark and/or copyright issues. Industry has estimated that these proposed changes will impose costs of between \$4166/SKU to as much as \$16500/SKU once all costs are factored in.

Surely an assessment of the uptake and impact of the current DrinkWise labelling options would be a more suitable step to take at this stage. It is inexplicable to me that the Departments of Health are advocating such an expensive and inflexible option, which will place such an impost on all producers in this field as to ensure that many will go out of business, leaving employees out of a job and hurting the economy.

If the sensible step of evaluating current practice before prescribing alterations is not to be followed, the following alterations would act to some degree to mitigate the harm of the proposed plan:

1. Rather than mandate colours, introduce contrast colour guidelines, in a similar way to what is required for other mandatory information
2. Change 'HEALTH WARNING' to 'PREGNANCY WARNING'. Health warning is misleading and alarming to my customers - while there is no safe level of drinking while pregnant there is no substantive evidence that this applies otherwise.

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TIME IS MUSIC THE PLANETS MAKE!

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3. Increase the threshold for vessels to 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 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

Rookwood Brewing and Distilling

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