

## **Submission to Proposal P1050 – Pregnancy warning labels on alcoholic beverages**

### **A. Name and contact details (position, address, telephone number, and email address);**

Director  
Yeringberg Pty Ltd  
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### **B. For organisations, the level at which the submission was authorised.**

Board level

### **C. Summary (optional but recommended if the submission is lengthy)**

As a small wine producer (less than 2000 cases, 7 SKU) any changes to mandatory labelling will impose a significant cost to my business. I do not believe that the proposed pregnancy warning label is suitable nor justified. A public education campaign would be more effective.

### **Comments to specified sections of P1050 Call for Submissions (CFS) report:**

#### **D. Literature review on the effectiveness of warning labels (section 3.1.1 of CFS)**

#### **E. Consumer testing of warning statements (section 3.1.2)**

#### **F. Pictogram (section 3.2.2.2)**

I have three objections to the pictogram.

##### **1. Words not pictures**

I would prefer to see a US style warning in words, rather than the use of a silhouette of a pregnant women about to have a glass of wine.

I think this particular pictogram in an odd way legitimises drinking while pregnant.

##### **2. Shape of glass:**

The shape of the glass used in the pictogram singles out wine as the culprit beverage. What about women who drink sparkling wine, cruisers, mixed drinks, spirits, beer etc etc? Are we going to have a different pictogram for each alcoholic beverage?

##### **3. Colour:**

My wine label is black and gold, and I object very strongly to putting a red label on my wine. This will not only add extra cost, but it will significantly detract from my carefully designed label.

My boxes are printed only in black for environmental reasons. I do not wish to start using colour on my boxes.

#### **G. Warning statement (section 3.2.2.3)**

FSANZ states that any amount of alcohol can harm your baby, yet also says alcohol under 1.15% is ok. This is inconsistent and confusing.

#### **H. Design labelling elements (section 3.2.2.4)**

'Pregnancy Warning' would be more targeted than 'Health Warning' and also reinforces the pictogram message.

I accept that only containers under 200ml can only have the pictogram, but I believe larger containers eg 375ml should carry the full warning.

Why should the pregnancy warning be larger (and in red) than the mandatory allergen label, which could lead to severe illness or death? Perhaps it would be better to combine all the warning labels together, and include a message about responsible drinking.

Wine relies on the back label to inform the consumer about variety, vintage, provenance etc. There is limited amount of space on the label to do this. An unreasonably large warning label will erode my ability to tell the story of my wine.

#### **I. Summary of proposed pregnancy warning label design (section 3.2.2.5)**

#### **J. Beverages to carry the pregnancy warning label (section 3.2.3)**

It is inconsistent and confusing to say that "any amount alcohol can harm your baby" on the proposed warning statement, but on the other hand say that alcohol under 1.15% ABV is ok?

#### **K. Application to different types of sales (section 3.2.4)**

#### **L. Application to different types of packages (section 3.2.5)**

#### **M. Consideration of costs and benefits (section 3.4.1.1 of CFS)**

#### **N. Transitional arrangements (section 4.1 of CFS)**

Transitional arrangements need to cover existing stock which will be sold in due course.

For example, we hold a pallet or more of each vintage which is released progressively once it reaches 8 years of age. This means that I have wine which was labelled in 2019, which will not be sold until 2027. This wine is already labelled and packaged, it would be a real headache to try to change the labels and outer packaging.

Changing labels is a very costly exercise – if amendments are to be made, it would be better if these were done at the outset so that there are not multiple changes.

#### **O. Draft variation to the Australia New Zealand Food Standards Code (Attachment A of CFS)**

#### **P. Other comments (within the scope of P1050 – see section 1.5 of the CFS)**