

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 medium-sized craft brewery, located in Stepney SA with over 20 employees. Our business is owned by myself, my husband and another husband and wife team. We produce roughly 250-300,000L of beer per annum, distributing our product Australia- wide.

Your proposal to mandate a “Health Warning” Label is concerning and disappointing to us all here at Little Bang.

As a craft beer producer, we take great pride in how our product is presented to appeal to our customers. Our brand hinges on free artistic expression but we also firmly believe that people make their own choices and should be free to do so. Mandating a pregnancy health warning conflicts with both critical aspects of our business.

Making a clear statement on a can that pregnant women should not consume any portion of alcohol because it may damage the baby is insulting to a woman’s intelligence and freedom of choice. By putting this label on all alcohol you are subjecting ALL pregnant females to scrutiny and judgement where there is enough facing a woman in pregnancy as it is. This label, will cause harm to the pregnant woman’s self-confidence and self-worth. Where there are real issues like post-natal depression to consider, the woman’s psychological state during pregnancy and while breast feeding should be taken into serious consideration.

Studies show it is binge-drinking that leads to harmful effects on the fetus. It isn’t the woman that may have a can every now and then, or a half glass of wine with dinner during pregnancy that you should be targeting. It is the binge drinking culture that you should target. It is also binge drinkers in general that should be targeted in these types of campaigns.

The reduction in free artistic expression is the other concern, from a size, colour and the nature of the label. I 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 presently have 30 SKUs. I estimate it will cost a total of \$125,000 to comply with this proposal. We simply don’t have that money set aside for this additional cost. Even if I did have that money available, I would use it to invest in a range of other repairs, maintenance, build and process improvement that would improve our business and result in more employment.

I implore you to see common sense and make the following changes to the FSANZ proposal:

1. Remove ‘HEALTH WARNING’ and replace with ‘DRINK RESPONSIBLY’. This statement on cans is enough to make a point as it encompasses everyone. We don’t need to cast judgement on groups in society.
2. Rather than mandate colours, introduce contrast colour guidelines the same as is required for other mandatory information
3. Reducing the label of “DRINK RESPONSIBLY” to the words enables us to place it in a prominent position without impacting on our art.

Yours sincerely

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