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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

We are a distillery and winery in Warrandyte South, Victoria, who produce a range of Grappa, Liqueurs and Wine. We are a small, but growing operation and currently employ six people from the surrounding area who rely on us for their livelihoods.

Your proposal to mandate a "Health Warning" Label is extremely concerning for us and impact to our business will be stifling. As a small craft spirits and wine producer, we take great pride in how our products are presented to our customers.

All of our 4 grappa, 5 liqueur, and 6 wine products presently carry the DrinkWise Australia pregnancy advice. While this decision incurred a great deal of expense at the time, it has been well received by our customers. We believe this is an important message, however the proposed label format by FSANZ is not acceptable.

We presently have 15 SKU's and estimate this will cost us in excess of \$90,000 to comply with this proposal. Our Grappa SKU's will also require major label re-design as our plate layers do not contain either black or red 485, and these labels already use the maximum plate / printing layers available. We currently use contrast colour guidelines for our DrinkWise Australia pregnancy advice on our labels. We do not have the funds available for the proposed pregnancy warning label, and future growth and development plans will be severely impacted.

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 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.



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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

Pietro Gallo Distillery
Pietro Gallo Estate