

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

Submitted by:

Sauce Brewing Co  
1a Mitchell St  
Marrickville NSW 2204  
P: 02 8580 3550  
E:

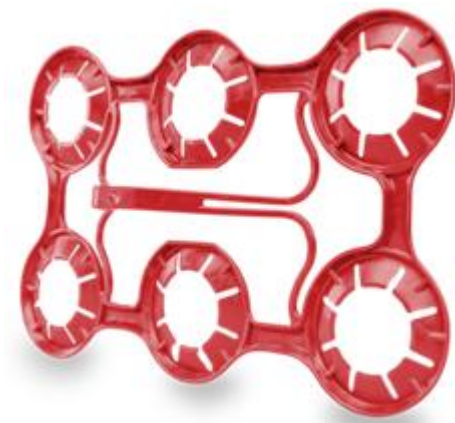
To whom it may concern

This proposal is extremely concerning to us.

While nobody would argue that drinking during pregnancy is potentially harmful to unborn babies, this proposal will cause significant financial harm to small producers who are already struggling in a soft retail market amid intense competition. Worse than that, the effectiveness of this proposal in reducing alcohol consumption by pregnant women is highly questionable.

Our key concerns are summarised below.

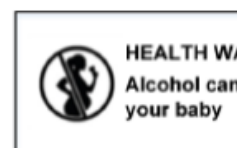
1. According to the “National Drug Strategy Household Survey 2016”, carried out by the Australian Institute of Health and Welfare, 98.8% of pregnant women are aware that drinking while pregnant is potentially harmful to their baby. That is a staggeringly high number and you would have to agree that existing awareness campaigns are working. Does anyone really believe that the remaining 1.2% are likely to be dissuaded by a new warning on their bottle of booze?
2. The proposed label is significantly larger than all other regulatory mandatory information and so is likely to dominate the label, thus making other warnings or information less visible and less likely to be read.
3. The proposal seeks to force all producers to include the new warning on all containers and packaging types – primary, secondary, and tertiary. This is largely unnecessary and in some cases physically impossible. Secondary packing (4/6-pack carriers) is often only applied to the top of containers, and so the warning on the primary packaging (single cans/bottles) is still visible. Add to this that these types of carriers are not able to be printed on or to have labels applied, due to their shape and style. See images below for examples of secondary packaging.



4. The proposal suggests that the colour red is used for the warning. This is potentially unworkable for many packaging and printing types which are limited to a maximum number of colours (typically 4 colours). For a brand to add the colour red to their packaging, they will need to sacrifice one of their existing colours. For many businesses, their colours are their brand. A complete re-work to cater to the new red warning would be detrimental to the identity and recognisability of those brands. Add to this the ineffectiveness of a red warning on packaging which is a similar colour already.

It would be more sensible to simply use a contrasting colour, as is the case with other information like standard drinks and recycling logos.

5. Some of the suggested wording of the proposed warning is inaccurate and inflammatory, and does not reflect current science. "Health Warning" would be better described as "Pregnancy Warning". The most accurate message to follow would be "it is safest not to drink while pregnant".
6. Small businesses will be hit hardest by these changes. Small producers have only just been through the exercise of updating all their packaging to cater to the various state-based container deposit scheme labelling requirements, having had to absorb those costs. The cost of changing over all packaging is in the tens of thousands PER PRODUCT. Small producers such as microbreweries produce a high number of products, in small volumes. Therefore, the changeover cost is exponentially higher for small producers. Each single change of design means a small producer's packaging costs could double or triple in a single year. In this economic climate, small businesses cannot afford to go through this again. They will simply bow out of the industry and jobs will be lost.
7. There is already a significant amount of mandatory information required on all containers. We have simply run out of room. It is simply not viable to add a 5cm by 2cm bordered warning in the space that is left. See example of one of our can labels below. To add this new warning would require sacrificing other important commercial and regulatory information.



We respectfully request that this proposal be seriously reconsidered. It would seem to be completely unnecessary, with the dubious benefits far outweighed by the cost to industry and the damaging impact to small business and jobs.

Sincerely,

