

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

Seppeltsfield Road Distillers is a young craft distilling business just over 1 year old in the Barossa Valley, South Australia. We currently employ 17 staff across various roles in production, sales and within our tasting room.

Your proposal to mandate a "Health Warning" Label is an unnecessary and poorly designed proposal which lacks relevant evidence on its expected benefits compared to other alternatives.

As a small, regionally-based craft spirits producer, I take great pride in how my product is presented to appeal to my customers. Our products have been highly awarded for their content and packaging and our packaging design has been recognised amongst the 50 most beautiful gin bottles globally.

My products presently carry the DrinkWise Australia pregnancy pictogram which we feel is a responsible position which reinforces other actions and publicity informing of the dangers of drinking while pregnant.

[Insert words in your own language and tone similar to:

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.

I presently have 9 SKUs. I estimate it will cost me in excess of \$10,000 to comply with this proposal. I simply don't have that money set aside for this additional cost. Even if I did have that money available, I would hope to use it to invest in new promotion of our distillery doo/ tourism experiences and export growth.

I implore you to see common sense and should the introduction of a mandatory warning label proceed, as a minimum, 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 my 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.

These changes could be introduced sympathetic to my overall label design, don't impose significant costs through additional colours, don't steal as much valuable label real estate, and don't tell all my customers they are drinking a harmful substance.

Yours sincerely

Director