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21st CENTURY DISTILLERY
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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

I am a small, independent distiller who is just starting out on the journey to build a sustainable future. Currently it is only a one man operation but hopefully in the future it's growth will allow me to employ some extra staff.

Your proposal to mandate a "Health Warning" Label is of great concern as it would result in a big financial burden to my business. The cost of just reprinting existing label stocks would be about \$7,000 and that is without the cost of having label artwork redesigned and all marketing/media material redone.

As a small spirits producer, I take great pride in how my product is presented to appeal to my customers.

My gins and liqueurs 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 my customers and team.

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 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 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 are sympathetic to my overall label design, don't impose costs through additional colours, don't steal as much valuable label real estate, and don't make all my customers think they are drinking a harmful substance.

Yours sincerely

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