



Attn: Food Standards Australia and New Zealand
SUBMISSION: P1050 - Pregnancy warning labels on alcoholic beverages
Via email: submissions@foodstandards.gov.au

22 October, 2020

To Whom It May Concern,

We are a Melbourne based distillery, maturing our unique spirit in Australian red wine barrels to produce Starward Australian whisky. Currently employing over 50 full time and casual staff at our two Victorian sites, we sell our whisky across all Australian states, as well as exporting into the USA and Europe, as well as Japan and New Zealand.

As one of Australia's largest whisky producer, we take great pride in how our product is presented to appeal to our customers. We have won numerous international awards for our product, including Best Australian Single Malt at the World Whisky Awards and Best Craft Distiller Whisky at the San Francisco World Spirit Competition.

All Starward whisky products presently carry the DrinkWise Australia pregnancy advice. While this decision incurred additional expense at the time, our business has fully supported this requirement. However, your proposal to mandate a "Health Warning" Label is of real concern to us.

Specifically, we do not believe the proposal from Food Standards ANZ (FSANZ) for a very significant and costly label change is appropriate when some small changes to what is being proposed would have a similar impact at much lower cost.

We would strongly support 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 potentially alarming to 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 our overall label design, do not impose costs through additional colours, do not require as much valuable label real estate, and do not have our customers thinking that they are drinking a harmful substance.

Yours sincerely