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Winery, Liqueurs, Brewery & Distillery

ABN: 65 117 662 709

Castle Glen Liqueurs Australia Pty Ltd

ABN: 55 077 332 711

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 small manufacturer of Wines, Fortified Wines, Liqueurs, Beer and Spirits. Our vineyard, manufacturing and Cellar Door is located on the Granite Belt with two Satellite Cellar Doors located at Montville and Tamborine Mountain. We employ 7 people who rely upon us for their livelihood.

Your proposal to mandate a "Health Warning" Label is concerning to our business as It also sends a message to our customers that all of our products could be deemed to be Unhealthy. Also the added cost in the graphic design and production of labels for our extensive range of products.

We produce products that are "All Natural" – no preservatives or chemicals and our grapes are grown organically. The "Health Warning" would be detrimental to the marketing and sale of our unique product range.

As a small, regionally based producer of alcoholic products including, wine, fortified wine, liqueurs, beer and spirits we take great pride in how our products are presented to appeal to our customers. We have won 37 Awards including 3 Gold Medals and 2 Grand Champions for exceptional product manufacturing.

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. The labelling should send a message to those that are pregnant rather than a "Health Warning" to all persons – this label could be construed this way.

We presently have approximately 300 SKUs. We estimate it will cost us a total of \$18,000.00 (approx.) to comply with this proposal. We simply don't have that money set aside for this additional cost. Even if we did have that money available, we would hope to use it to continue to employ the staff that we have and these extra costs would impact our ability to continue to do this.

We implore you to see common sense and make the following changes to the FSANZ proposal:

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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

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3. Increase the threshold for vessels to only be required to display the pictogram from 200mL to 500mL, 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 500mL.
4. Why can't a pregnant woman make a decision for herself whether she chooses to partake in an alcoholic drink or not.

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 when we have spend years in research and development to produce healthy alcoholic beverages for the discerning customer.

Yours sincerely



Castle Glen



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Award Winning
All Natural



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