

Attn: Food Standards Australia and New Zealand
SUBMISSION: P1050 - Pregnancy warning labels on alcoholic beverages

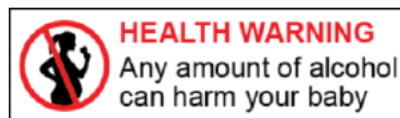
Via email: submissions@foodstandards.gov.au

To Whom It May Concern

CAVU Distilling is a startup business investing several million dollars in establishing a state of the art boutique distillery at Woombye on the Sunshine Coast.

The distillery will be a significant employer in the region showcasing Queensland and Sunshine Coast manufacturing and produce.

The Departments of Health across the country have given direction to Food Standards Australia New Zealand (FSANZ) to develop the below MANDATED "Health Warning" label for our containers of between 6-9mm in diameter, and outer packaging of at least 11mm in diameter:



This proposal to mandate a "Health Warning" Label is a real concern.

The proposal mandates three colours – black, white, and pantone red 485. For producers that use four or six colour labels, this represents a major constraint to creativity and maximising our ability to connect with consumers and ensure our business, employment and investment is sustainable.

I implore you to review the direction provide by the Departments of Health 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 small changes to what is being proposed would have a similar impact at much lower cost, are sympathetic to my overall label design, don't lessen my products ability to connect with consumers, 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.

Please don't hesitate to let me know if I can assist further with any information.

Yours sincerely