
holic beverages

As a small wine grower and producer, we submit:

Agreed it is unwise to consume alcohol during pregnancy – but do question that this warning labelling is only preaching to the converted and will not target those most at risk without supporting activities.

We are small grower and wine producer, with currently 24 SKUs – every one of which will need a plate change for printing. And as we are artisan and very low volume (around 120 tonnes per annum) it will take a longer time to reach breakeven on the payback of these costs compared to a large producer with high volumes per SKU. Therefore see this as far more onerous on small producers – unfairly so.

On the above grounds we see this as a severe hindrance to artisan producers, upon whom the greater higher volume producers are now becoming reliant upon for the stories and mystique of New Zealand wine.

Library stock wines are in vogue now, which requires stock being held back for re-release in later years, often longer than 2 years. If this stock needs pregnancy warning labelling, will sperate hand applied stickers be allowable? Given the small volume it is unaffordable to re-label.

Our strongest objection is to the ugliness and cost of red in the warning label proposed in the consultation document. Being a small producer who has invested care and time and money into crafting a multi-award winning brand design and labels, we believe it is a visual crime to slap red into the colour fields used in our labelling. We would much prefer a black warning.

Warning should be the same size as allergen labelling – and or standard drinks – as otherwise it elevates pregnancy warnings above other health concerns.

We object to the use of the silhouette of woman with ponytail – it is the pregnancy that is of concern - not hairstyle – adds nonessential detail.

Thank you for considering our concerns,

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