
From:

Sent:

Saturday, 26 October 2019 12:53 PM

To:

submissions

Cc:

Subject:

SUBMISSION: P1050 - Pregnancy warning labels on alcoholic beverages

The Gin Factory
5 Apanie Ave
Narara 2250

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

My wife and I are in the early stages of launching a small craft distillery. We do not have any products on the shelf yet. However, we are experimenting with flavours and have conducted a considerable amount of research into bottling, labelling and creating a brand for our company and product.

Your proposal to mandate a "Health Warning" Label has us greatly concerned over the increased cost of production and the negative effects a mandated colour scheme will have on our brand's aesthetic.

As a regionally based craft spirits producer, we take great pride in how our product will presented to appeal to our customers. Whilst nothing has been printed yet, we have already incorporated the existing DrinkWise Australia pregnancy advice on our label designs.

We were very disappointed to hear that Food Standards ANZ (FSANZ) are proposing a very significant and costly label change, when some small changes to the proposal would achieve the same goal at a 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 will have far less impact on 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

