

ARCHIE ROSE

DISTILLING CO.

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 but fast-growing craft distillery located in Rosebery, Sydney, creating an internationally award winning range of Vodka's Gin, and Whiskies as well as employing over 50 full time staff across the business.

Your proposal to mandate a "Health Warning" Label is extremely concerning as it will pose a significant and unrealistic financial burden on our business (see below), as well as impact the design and branding of our products, which have previously won World's Best Spirits Packaging and World's Best Brand Identity in London & USA respectively – a huge achievement for a small Australian producer. **I also note that we already include the existing DrinkWise pregnancy advice on all our 700ml spirits.**

Our spirits and packaging design are extremely important to us and we have been lucky enough to win over 200 international awards, including:

World's Best Rye Whisky - World Whisky Masters

World's Best Unaged Whisky - Four-Time Winner in 2017, 2018 & 2019

World's Best International Contemporary Gin - American Distilling Institute Craft Spirits Awards

World's Best International Vodka (Neutral Profile) - American Distilling Institute Craft Spirits Awards

World's Best Brand Identity - American Distilling Institute Craft Spirits Awards

Australia's Best Single Malt Whisky - Three-Time Winner in 2018 & 2019

Australia's Most Innovative Company (Retail, Hospitality, Tourism & Entertainment) - Financial Review BOSS Awards

All our 700ml spirits presently carry the DrinkWise Australia pregnancy advice. While this decision incurred a great deal of expense at the time, it has been well received by my customers and team.

I find it extremely concerning 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.

We presently have over twenty (20) SKUs. I estimate it will cost me a total of \$200,000 to comply with this proposal. I simply don't have that money set aside for this additional cost. Even if I did have that money available, I would hope to use it to invest in new equipment, casks, staff and product development, as well as kick start our export efforts.

I 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 needlessly 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 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