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Attn: Food Standards Australia and New Zealand

By email: submissions@foodstandards.gov.au

Submission to P1050 Pregnancy warning labels on alcoholic beverages

To whom it may concern,

The Independent Brewers Association (IBA) is the peak national industry body representing Australia's 600+ independent brewers.

Currently, independent brewers account for 5.9 per cent of Australia's beer production by volume and are growing their total volume at a rate of 25% per year. However, independent brewers are responsible for 41.4 per cent of direct employment in our sector.

The IBA is committed to encouraging responsible drinking. In October 2018, we released the IBA Beer Labelling Guidelines in order to support our members and encourage them to adopt the voluntary DrinkWise pictogram and pregnancy warning.

We wholeheartedly support the overall proposal to mandate the application of pregnancy warning labels to packaged alcoholic beverages of over 1.15 per cent ABV.

However, we are concerned that the suggested implementation of the Proposal may impose unwarranted costs of more than \$100M over the next ten years on a small but growing industry.

There seems to be an absence of logic in the Government's decision to impose these costs on our industry given;

- 1) The amount of evidence that suggests that the current packaging voluntary initiative has been successful. The 2016 National Drug Strategy Survey indicated that 98.8% (up from 96.6% in 2004) of women either abstain or reduce their alcohol consumption when pregnant. Therefore, awareness and behavioural change is occurring as a result of the Drinkwise initiative.
- 2) Your own paper says, "where alcohol warnings labels have been introduced, they have had limited impact on consumption behaviour", therefore adopting a mandatory alcohol warning on packaging is at odds with that.
- 3) The size, comparative scale and proposed colour of the warning appears out of balance with other mandatory information required such as ABV alc% and standard drinks for alcoholic beverages, and other FSANZ packaging requirements around allergens which have the potential to cause immediate harm to consumers.
- 4) There was no comparative research conducted to determine how effective the proposed warning was Vs the existing Drinkwise initiative. Therefore, it is impossible to draw any conclusion that the proposed change will be any more effective than the current Drinkwise initiative.

In terms of the design of the FSANZ proposal, the main elements of concern are the following:

- 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 trade customers / retailers and consumers
- 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.

While we support the overall aim of mandatory pregnancy warning, implementing the proposed designs will have marginal additional benefits over the current labelling standards which are being implemented by independent brewers. Implementing the new recommendations will have a disproportionate impact on the financial viability of these small and medium enterprises and the 2,700 jobs that these businesses support.

The independent brewing industry is a high growth industry made up of many small and medium sized enterprises. The industry contributes significantly to the local economy, including in regional areas, of Australia through the creation of much needed employment.

The IBA would welcome the opportunity to further discuss the issues raised in this submission. Any queries can be directed to

Yours faithfully