

Submission

November 2022

FSANZ Application A1256 – Colour of pregnancy warning labels for corrugated cardboard packaging

Spirits and Cocktails Australia and the Australian Distillers' Association support the application made by the Brewers Association of New Zealand to permit pregnancy warning labels on corrugated cardboard (CC) packaging used for the outer package of multiple individual units of alcoholic beverages to be in a single colour on a contrasting background.

As had been noted in the application, and recognised by Food Standards Australia New Zealand (FSANZ), the request is of a technical nature, and reflects the practical problems in CC printing in multiple colours as required by the FSANZ Code as a result of Proposal P1050. Printing multiple colours can result in misalignment, causing images and text to be unclear to its audience. "Post print" printing methods involve printing directly onto the cardboard sheets from which CC outer packaging is made using flexible plates fixed to a rotating drum. Each colour that is printed has its own plate. The colours are printed sequentially and are each printed with a +/- 3 mm variation in accuracy. If one colour is misaligned, this will affect the legibility and compliance of the pregnancy warning. However, this effect is significantly amplified if more than one colour is misaligned as the above examples demonstrate.

As retailers use CC outer packaging for in-store displays, including for pre-mixed spirit beverages, and producers do not have control over which packaging is used in displays, producers are required to ensure that all CC packaging is compliant with the Code. Therefore, we support the application to change to the Code for pregnancy warning labels as applied only to CC packaging to allow markings to be in a single colour, thus addressing the issue of colour misalignment.

We note the additional elements and timeframes FSANZ is proposing on top of the changes sought in the application, namely the increased size of the pregnancy warning labels and the limited 6 month extension to the original deadline for implementation. We raise no objections to these aspects of the revised application.

For more information on this submission, please contact

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