

[REDACTED]

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

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

[REDACTED]

- This is a minor technical change to the Code. Most wine is removed from the outer packaging before being sold at retail, and consumers will see the pregnancy warning mark on the product label (eg on the wine bottle) in any event.
- The reason for the change is a technical issue with the printing process for corrugated cardboard outers.
- Even with the proposed change to a single colour, the messaging is still clear and the 25% size increase as proposed by FSANZ should mitigate any perceived issue with consumer attention to the pregnancy warning mark. [We recognise this was a top priority for FSANZ during the design of the pregnancy warning mark.]
- If the change is not made, the impact of misalignment during the printing process has the ability to reduce the clarity of the message more than reduced attention from lack of colour.
- The technical issue was raised in the original consultation process but was not addressed. Therefore, we have had to unfortunately seek this application at industry's own significant cost.
- We welcome FSANZ's proposal to extend the transition period for the outer packaging requirements for a further six months, and to allow stock in trade (ie all product that is packaged and labelled before that date) to continue to be sold until exhaustion. This is particularly important for a product like wine, given its long shelf life.

While not a perfect solution (and recognising there will still be added costs with this approach), this option would provide additional flexibility to meet the requirements.

- The pregnancy warning mark can be printed in a single colour (black).
- It must be printed in a larger size, to make up for the lack of red colour.
- The background must be the same colour as the corrugated cardboard liner (ie kraft brown, recycled brown or grey, or white).

Kindly,

[REDACTED]

[REDACTED]

[REDACTED]