



Spirits New Zealand

Submission to Food Standards Australia New Zealand.

Application A1256

Colour of pregnancy warning labels for corrugated cardboard packaging

November 2022

Submission

Spirits New Zealand is the national trade organisation representing New Zealand's leading producers, distributors, brand owners, importers and exporters of premium spirits and spirit-based drinks. Our members are Asahi, Bacardi, Beam Suntory, Brown-Forman, Diageo, Federal Merchants, Hancocks, Lion, Moet-Hennessy and Pernod Ricard.

Spirits NZ represents over 96% of spirit industry interests in New Zealand.

Spirits NZ members fully support and are transitioning to the use of the new pregnancy warning logo as described in P1050. We acknowledge that this transition will need to be complete by 1 August 2023.

We thank you for the opportunity to submit on Application A1256 which we have been aware of and have previously written in support of. This support continues.

We are aware of the registration issues associated with post-print processes on corrugated cardboard outer packaging. We believe that A1256 ably describes these issues, the reasons why they occur and the difficulties associated with maintaining printing integrity when trying to apply the colour pregnancy warning logo.

We welcome your summary of these issues and your approach to the resolution of them. We are, therefore, supportive of the proposed changes to the printing of the pregnancy warning label as prescribed in the Call for Submissions document.

In particular we note the ability to print in black and white and the adjusted sizing specifications (as depicted in Figure 4, and Table 1 respectively on page 13 of the call for Submissions document). We also accept your proposed transition arrangement of six months from the 1 August 2023 being the gazettal date for the new pregnancy warning logo. We would point out however that in the event of a review of your recommendations it is possible that affected members might have to print the coloured warning with all the known and described issues.

We would ask, in the event of a review which left A1256 unresolved at 1 August 2023, that a further extension is granted on this date until any review issues are resolved.

Thank you.

