



10 November 2022

Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604
AUSTRALIA

Submission from the Brewers Association of Australia - Application A1256 Colour of pregnancy warning labels for corrugated cardboard packaging

The Brewers Association of Australia supports mandatory pregnancy warning labels on alcohol packaging and our members are working to roll out these labels on all relevant products by 1 August 2023.

We want these labels to be as effective as possible and to support other efforts to tackle Fetal Alcohol Syndrome (FASD) which include significant industry funded education campaigns led by DrinkWise.

We thank Food Standards Australia and New Zealand for their work in considering this application and strongly support the recommendations set out in the call for submissions. We believe these recommendations will strengthen the labelling scheme by addressing a technical issue that would have made the pregnancy warning label on corrugated packaging, primarily used for transporting products, difficult to read.

We believe the solution put forward by FSANZ will allow industry to roll the labels out effectively and in a way that can be clearly seen and understood by all customers.

Issue with Corrugated Cardboard

Then Brewers Association of Australia can confirm that the description of the issue with the label as currently prescribed in regulations for corrugated cardboard (CC) outer packaging is accurate.

As our members have sought to roll out the labels we have found that when using the post-print process on CC, using the three colours currently prescribed can cause significant misalignment in the printing process making the pregnancy warning label difficult to read and reducing its effectiveness.

This issue does not apply to printing on beverage container labels or on smaller transportation packaging (eg six packs). It only relates to larger outer packaging (eg cartons containing 24 bottles or cans). There are several reasons why CC is the only viable material for this kind of transportation packaging:

- CC is extremely strong and durable and this is required given the products being transported are often made of glass and the liquid volume of alcoholic beverages makes them among the heaviest products sold in the FMCG setting.
- CC packaging is strong and durable enough to withstand repeated handling and stacking. Alcoholic beverage packaging must last a longer period of time than most other food and beverage packaging.

- Alcoholic beverages are also stored in chillers for prolonged periods, where cold and dampness can affect the strength of packaging.

CC packaging also has significant benefits in terms of sustainability. They have a high recyclability and do not require the same sorting or separation as plastics. Unlike plastics, all of the recycling takes place in Australia or New Zealand. If CCs are incorrectly disposed of, they degrade rapidly and do not persist in the environment like plastics. CCs printed with post print techniques also use water-based inks which are more sustainable than traditional petroleum-based inks.

FSANZ Recommendations

The Brewers Association of Australia supports the conclusion reached by FSANZ in their call for submissions that “an alternative pregnancy warning mark should be permitted for CC outer packaging of more than one individual unit of a prescribed alcoholic beverage, when a post-print printing process is used.” We believe this represents the most effective way of addressing the issue outlined above.

We support the proposed requirement by FSANZ that the amended label’s minimum size of type for the signal words and statement and the pictogram diameter be increased by around 25 per cent. We agree this will maintain the visibility and effectiveness of the label.

The original application sought a recommendation by FSANZ that the amended label contain a single colour on a contrasting background with no specific colour prescribed. We note FSANZ’s recommendation that the wording on the label should be prescribed as black on a background colour (white, brown or grey). Again we appreciate the detailed work done by FSANZ on colour, contrast and size and support the recommendation they have made.

Finally, we welcome and support the transitional arrangements specified by FSANZ in the call for submissions, particularly the 1 February 2024 deadline for implementation and the stock in trade provision. We believe these are reasonable and achievable deadlines given the challenges associated with the specific product packaging addressed as part of this process.

Again, I would like to thank FSANZ for their careful and diligent consideration of this application.

Yours sincerely,

