

15 November 2022

Via email to: submissions@foodstandards.gov.au

Independent Brewers Association response to Application A1256 – Colour of pregnancy warning labels for corrugated cardboard packaging

The Independent Brewers Association (IBA) is the peak national industry body representing Australia's 600 independent brewers, 65% of these being small businesses based in regional and rural Australia.

Australia's 600+ independent brewers contribute an estimated \$1.93 billion in economic output to the Australian economy and employ 6,891 people, representing 51% of all employment in the brewing industry.

For every direct job in the brewing industry, a further 3.8 jobs are created in associated industries such as agriculture, logistics, manufacturing, hospitality and services. This means that the independent brewing industry is responsible for supporting over 33,000 jobs reflecting its significance to the Australian economy.

We thank the NZ Brewers guild for their initiative and FSANZ for responding with a review of the colour of pregnancy warning labels for corrugated cardboard packaging which explicitly recognises the challenges faced by the industry in implementing elements of the pregnancy warning code.

The IBA supports the proposed solution to amend Standard 2.7.1-12 to allow for the printing of the pregnancy warning in a single colour on a contrasting background for corrugated cardboard carton outer packaging for multiple unit packages to ensure the legibility of the pregnancy warning and remove compliance issues for our members.

As many of our members have proactively transitioned towards implementation of Division 4 of Standard 2.7.1, it has become apparent that the standard "post print" printing process for corrugated cardboard cartons used as outer packaging causes significant misalignment when printing the pregnancy warning in three colours which makes it difficult to read and therefore reduces its effectiveness.

We also agree that proposed solution in the amendment is the best available option (from the perspective of suitability, availability, cost or sustainability) as it will continue to support the objectives of P1050 by ensuring that the pregnancy warning is clearly legible.

Regarding timing of implementation (pending the administrative process of the FSANZ Board considering the application in March 2023 and requirements of the Food Ministers) given the industry must comply with all pregnancy labelling requirements from 1 August 2023 we would ask that corrugated cardboard packaging does not have to display a pregnancy warning label until the end of the transition period which we understand to be 1 February 2024.

Thank you in advance for your time in considering our submission. I can be contacted on [REDACTED] [REDACTED] should you require any further information.

Yours sincerely,

