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DB Breweries' submission on Application A1256

Colour of pregnancy warning labels for corrugated cardboard packaging

DB Breweries "DB" welcomes the opportunity to respond to Food Standards Australia and New Zealand ("FSANZ") Call for Submissions – Application A1256: Colour of pregnancy warning labels for corrugated cardboard packaging.

DB is committed to being a responsible producer and supports the warning labelling of alcoholic beverages. Since the gazettal of P1050 and the introduction of Division 4 to Standard 2.7.1, DB has been transitioning to include the pregnancy warning on labels and outer packaging.

However, DB, along with other producers, has had technical issues with the implementation of the current pregnancy warning label requirements when printing on corrugated cardboard cartons using the post print printing process.

Specifically, the requirement to use three colours for the pregnancy warning label has resulted in significant misalignment issues. The nature of the printing process means that there is a $\pm 3\text{mm}$ margin of error for print registration for each colour which leads to misalignment. The risk of misalignment affects all post printed corrugated cardboard cartons.

DB has significant experience using corrugated cardboard carton packaging and uses the post print process for most products. Our printer has also provided feedback that the current pregnancy warning label requirements are too difficult to print accurately with post print.

Where misalignment is visible, the pregnancy warning can be difficult to read and have reduced effectiveness. To counter this issue and ensure the label is accurate and legible, DB supports the proposal to allow the alternative pregnancy warning mark to be printed in a single colour, black, on a contrasting background for corrugated cardboard outer packaging for multiple unit packages of alcoholic beverages.

This change would affect only a small subset of products at the point of sale. It would have minimal impact on potential attention to the pregnancy warning that is offset by the gain in consistency and comprehension against the potential for unclear, misaligned labels.

The proposed changes will have no impact on the pregnancy warning label as it appears on product labelling and therefore at the point of consumption.

