

Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604



Application 1256

Colour of pregnancy warning labels for corrugated cardboard packaging

Who we are

Australian Grape and Wine Incorporated (Australian Grape & Wine) is Australia's national association of winegrape and wine producers. We represent the interests of the more than 2,000 winemakers and 6,000 winegrape growers working across Australia's 65 wine regions. These businesses employ more than 160,000 people, with the sector (defined as wine grape growing, winemaking and wine related tourism) contributing \$45.5 billion in gross output to the Australian economy¹. The majority of this contribution is seen in rural and regional Australia, with the sector driving economic growth, local manufacturing, regional exports and food and wine tourism.

Our role is to help forge a political, social and regulatory environment - in Australia and overseas - that enables profitable and sustainable Australian grape and wine businesses. To do this, our activities focus upon the objective of providing leadership, strategy, advocacy, and practical support. We represent small, medium and large winemakers and winegrape growers, with policy decisions taken by the Australian Grape & Wine Board requiring 80% support, ensuring no single category can dominate the decision-making process and guaranteeing policy is only determined if it provides significant industry benefit. In practice, most decisions are determined by consensus.

Australian Grape & Wine is recognised as a representative organisation for winegrape and wine producers under the *Wine Australia Act 2013* and is incorporated under the *SA Associations Incorporation Act 1985*.

Contextual points

Australian Grape & Wine is working with its members and the broader Australian wine sector to comply with the mandatory pregnancy warning labelling requirements scheduled to enter into force on 1 August 2023.

We support the proposal outlined in Application 1256 (the Application) to allow the pregnancy warning label on outer-packaging (in our case, wine cartons) to be presented in a single colour on a contrasting background. This resolves a technical printing issue without detracting from the intent of the decision to mandate the warning on alcohol beverages, including wine.

Technical challenges

Australian Grape & Wine agrees with the assessment presented in the Application regarding the challenges of printing the tri-colour pregnancy warning label on corrugated cardboard packaging. As stated in the submission, a number of wine companies have expressed difficulty in preventing misalignment during the printing process, which left unrectified, could lead to the warning label being difficult for purchasers to read.

The proposed solution

¹ AgEconPlus Consulting, "Economic Contribution of the Australian Wine Sector 2019".



Australian Grape & Wine 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 agree that this is the most effective approach to addressing the technical challenges outlined above.

Furthermore, we accept the proposal to increase the size of type for the signal words and the statement and the pictogram diameter by 25 per cent to ensure the warning is clearly visible to consumers.

We are also comfortable with the proposal to present the text, pictogram and border to be presented in black, although we note the original application called for the slightly more flexible approach of allowing for contrasting colour, as opposed to a single mandated colour.

Transition period

Australian Grape & Wine welcomes 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.

Additional commentary

In addition to corrugated cardboard, Australian Grape & Wine would suggest a consistent approach to all cardboard outer packaging. From the perspective of a wine business, cartons are used almost exclusively as transport-packs as opposed to a package designed for retail sale. While we fully support the proposal as it relates to corrugated cardboard – which we understand the majority of our members use when packing and shipping their wine - It would be a perverse outcome to have inconsistent rules for one type of cardboard (that being corrugated cardboard) and other types of cardboard, with potential challenges for compliance and enforcement officials.

Secondly, the industry would appreciate clarification about the status of cartons used for transport packaging. It is our view that the vast majority of wine cartons are primarily used for this purpose and, as such, should not be required to carry the pregnancy warning label.

Finally, we commend FSANZ on the way in which it has engaged with industry on this issue and thank officials for the constructive and consultative approach.

Should you require any further information, please feel free to contact me.

Kind regards

