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Application A1256 – Colour of pregnancy warning labels for corrugated cardboard packaging: To permit pregnancy warning labels on corrugated cardboard packaging used for multiple individual units of alcoholic beverages to be in a single colour on a contrasting background.

We are a long established wine company in NZ and have been selling wine domestically since 1991. We are writing regarding this proposal or in reality a minor technical change to the Code. Please be aware that most wine is removed from the outer packaging before being sold at retail, and consumers will see the pregnancy warning mark on the product label (e.g. on the wine bottle in red as per the new rules) in any event. In fact at Countdown supermarkets all wine sales are made 'by the bottle' with no outer packaging being present for the consumer.

- The reason for the change is a technical issue with the printing process for corrugated cardboard outers.
- Even with the proposed change to a single colour, the messaging is still clear and the 25% size increase as proposed by FSANZ should mitigate any perceived issue with consumer attention to the pregnancy warning mark. [We recognise this was a top priority for FSANZ during the design of the pregnancy warning mark.]
- If the change is not made, the impact of misalignment during the printing process has the ability to reduce the clarity of the message more than reduced attention from lack of colour.
- The technical issue was raised in the original consultation process but was not addressed. Therefore, we have had to unfortunately seek this application at industry's own significant cost.
- We welcome FSANZ's proposal to extend the transition period for the outer packaging requirements for a further six months, and to allow stock in trade (i.e. all product that is packaged and labelled before that date) to continue to be sold until exhaustion. This is particularly important for a product like wine, given its long shelf life.

Thank you for your consideration.

Best regards,

