



# NEW ZEALAND WINE

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## NEW ZEALAND WINEGROWERS' SUBMISSION ON APPLICATION A1256 – COLOUR OF PREGNANCY WARNING LABELS FOR CORRUGATED CARDBOARD PACKAGING

NOVEMBER 2022

### 1. Introduction and summary

New Zealand Winegrowers (**NZW**) provides strategic leadership for the wine industry and is the body that represents the interests of all of New Zealand's grape growers and wine makers. Established in 2002, NZW is funded by compulsory levies under the Commodity Levies Act and the Wine Act and has approximately 1,400 members. New Zealand is the only major wine producing country to have a single, unified industry body that represents both grape growers and winemakers.

Thank you for the opportunity to provide feedback on Application A1256 *Colour of pregnancy warning labels for corrugated cardboard packaging*. NZW provides the following written comments for your consideration.

NZW's overall position is that, while the proposal is not a perfect solution (and recognising there will still be added costs to businesses with this approach), this option would provide additional flexibility to meet the pregnancy labelling requirements under the Australia New Zealand Food Standards Code (the **Code**) and NZW therefore supports it.

### 2. **This is a minor technical change to the Code, due to an issue with the printing process for corrugated cardboard outers, which was raised in the original consultation but was not addressed.**

The existing provisions in the Code dictate that the pregnancy warning mark (the **Mark**) must be printed in three colours: red, black and white. We understand that most corrugated cardboard used for the outer packaging of alcoholic beverages is printed using the post-print process. As discussed further below, printing in three colours using this process can result in a misalignment of the elements of the Mark, reducing its clarity and effectiveness.

In addition, this technical issue was raised in the original consultation process but was not addressed by Food Standards Australia New Zealand (**FSANZ**). Industry has now had to seek this application at its own cost.



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**3. The impact of the proposed amendment would be very minor.**

Most corrugated cardboard packaging for alcoholic beverages is used for transportation only and the Brewers Association of New Zealand estimate that only 8% of beer and cider, 9.5% of wine and 12.5% of pre-mixed drinks remain in such at the retail point of sale.

In addition, each individual unit inside the packaging will display the three coloured Mark.

If this application is successful, the three coloured Mark will still be seen by consumers at the retail point of sale for most alcoholic beverages. For the very small share where it may not, it will be seen at the point of consumption.

**4. The proposed size increase and contrasting colours should mitigate any perceived issue with consumer attention.**

Even with the proposed change to colour, the proposal maintains the efficacy of the Mark by prescribing a contrasting background and a 25% size increase. We consider these design elements are likely to attract the same level, if not more, of consumer attention as the smaller Mark with red colour.

**5. If the change is not made, misalignment during the printing process could reduce the effectiveness of the message more than any potential reduced attention from lack of colour.**

As mentioned above, printing corrugated cardboard in three colours can result in a misalignment of the elements of the Mark. If a consumer cannot read and understand the content of a label, it will be ineffective at conveying the information in a legible way. The proposed option for outer packaging will maintain efficacy and advance the aim of the Mark, to alert consumers about the risks of drinking alcohol during pregnancy and enabling them to make an informed choice.

**6. We support an extended transition and stock in trade sale period for the outer packaging requirements.**

The proposal to extend the transition period for the outer packaging requirements for a further six months and to allow stock in trade to be sold until exhaustion is particularly important for a product like wine, with a long shelf-life. This approach will help reduce the need for re-labelling, a significant cost to businesses.



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The current implementation date for the requirements is 1 August 2023 and this proposal, if accepted, will likely be finalised shortly before this date, making printing planning difficult for businesses. Furthermore, deciding on a new requirement so close to the original implementation date will put businesses in a difficult position if their planning is deferred and the proposal is not accepted, with three colour printing or overstickering required at short notice (which often comes at a greater cost).

## **7. Conclusion**

NZW supports this proposal. The scope and impact of its implementation is very limited, affecting only a small number of products at the point of sale and having a very minor impact on consumer attention to the Mark. This minor impact will be outweighed by the gain in clarity and efficacy compared to if the Mark is misaligned. The additional transition time will allow members to properly plan for and execute the required changes.

Thank you again for the opportunity to provide feedback on this proposal. We would be happy to discuss any of the points raised in this submission in more detail.

Kind regards

