



Pernod Ricard Winemakers

1 November 2022

PERNOD RICARD WINEMAKERS' SUBMISSION ON APPLICATION A1256: COLOUR OF PREGNANCY WARNING LABELS FOR CORRUGATED CARDBOARD PACKAGING

Pernod Ricard Winemakers is pleased to provide a submission in response to Food Standards Australia and New Zealand ("FSANZ") Call for Submissions – Application A1256: Colour of pregnancy warning labels for corrugated cardboard packaging released on 6 October 2022.

Pernod Ricard supports the proposal to permit an alternative pregnancy warning mark for corrugated cardboard outer packaging of more than one individual unit of a prescribed alcoholic beverage when a post-print printing process is used. We consider this to be a practical solution given the technical issues and costs associated with implementing the existing requirements for the pregnancy warning mark. We support the proposal that the text and border be the single colour of black and the background be the same colour as the corrugated cardboard outside liner.

Since the Gazettal of P1050, we have been transitioning to include the pregnancy warning mark on our labels. At the time of writing, around two-thirds of our SKUs in Australia and around half in New Zealand carry the pregnancy warning mark. However, when considering outer packaging, it became apparent that there would be issues printing the mark on corrugated cardboard cartons as described in Application A1256.

Along with other producers that use corrugated cardboard cartons, which are printed using the "post print" process, we have found that significant misalignment will occur due to the requirement to use three colours in the pregnancy warning mark. Each colour has its own plate and each colour is printed with a +/- 3mm variation in accuracy. If one or more of these colours is misaligned, the legibility and compliance of the pregnancy warning mark is impacted. Because of this, the pregnancy warning mark is more likely to be clear and accurate if it is printed in one single colour as proposed.

For Pernod Ricard Winemakers these cartons are used for 6 and 12 bottle cases of wine. These cartons are used for transporting and handling our product and are used in retail and grocery settings to store, display and sell our products. It is not possible for producers like us to determine which outer cartons will be removed before retail sale, so we are obliged to label all outer cartons in this way. The alternative proposed is a much improved solution to ensure these cartons will comply with the new regulations to include a pregnancy warning mark.



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In addition to the new pregnancy warning mark, Pernod Ricard is proactively launching a digital labelling system to better inform consumers about the products they purchase as well as responsible drinking. By 2024, a QR code on label will link to information on alcohol and health, responsible drinking, ingredients and nutrition information. We are also voluntarily including two pictograms warning against underage consumption and drink driving. These initiatives reflect Pernod Ricard's commitment to responsible drinking and consumer centricity.

If you would like to discuss any of the above with us, we are happy to be contacted.

