# FSANZ Colour of Pregnancy Warning Labels for Corrugated Cardboard Packaging

Food Standards Australia New Zealand (FSANZ) [called for submissions](https://www.foodstandards.gov.au/code/applications/Pages/A1256---Colour-of-pregnancy-warning-labels-for-corrugated-cardboard-packaging-.aspx) on an application to permit pregnancy warning labels on corrugated cardboard cartons (CCCs) to be in a single colour on a contrasting background. The requirements of ‘*Pregnancy warning labels on alcoholic beverages’* as incorporated into the Australia New Zealand Food Standards Code (the code), cover the scope, application, size and colour requirements of the warning labels. These are important requirements that help prevent alcohol harm during pregnancy, including fetal alcohol spectrum disorder (FASD).

FARE has concerns that the FSANZ draft food regulatory measure responding to this Application, may compromise these evidence-based requirements, without fully exploring possible alternatives. FARE’s submission noted the following concerns with the draft food regulatory measure responding to this Application:

* Achieving the regulatory objective relies on full implementation;
* the cost / benefit analysis has been completed;
* more detailed retail-displayed data is needed;
* industry concerns have been considered;
* FSANZ evidence is established and accepted; and
* point-of-sale is as important as point-of-consumption.

FARE recommended consideration of three options:

1. Retain the design and colours as currently defined in the code.
2. Require the printing of “NOT FOR RETAIL DISPLAY” label on all post-printed CCCs.
3. Require the printing of a larger design (retaining original three colours) with a greater separation (> 6 mm) between each element. It accommodates and avoids any overlap or distortion, even if there is maximum misalignment in the printing registration.

[view submission as pdf](https://fare.org.au/wp-content/uploads/FARE-Submission-Letter-to-FSANZ-on-CCC-single-colour-Application.pdf)