

# CIDER LABELLING GUIDE

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#### 1. INTRODUCTION

#### 1.1 SCOPE OF GUIDANCE

The Cider Labelling Guide is a tool to assist Cider Australia members to create cider labels that conform to regulatory requirements.

The Guide applies to pre-packaged cider only, covering single unit (can/bottle), multi-pack and carton packaging.

The Guide is designed for use in relation to cider sold in Australia.

Under the Trans-Tasman Mutual Recognition Agreement, food products that are legally labelled in Australia can in most cases be sold in New Zealand without amendment.

Other export markets may have their own set of rules, so ensure that you research and/or obtain advice on the rules for each particular market.

It is recommended you consult with your local distributor or importer to ensure they are satisfied your labelling meets the requirements of their market.

### 1.2 REGULATORY AUTHORITIES

The following organisations have a role in regulating cider labelling in Australia:

- Food Standards Australia and New Zealand (FSANZ)
- <u>Department of Agriculture, Water and the</u> Environment
- State and Territory Food Regulators (FSANZ maintains a list of contacts in each jurisdiction)
- Australian Competition and Consumer Commission (ACCC)

- National Measurement Institute
- Alcohol Beverages Advertising Code Scheme (ABAC).

#### 1.3 RELEVANT STANDARDS

These Guidelines primarily refer to the Australia New Zealand Food Standards Code, as produced under the Food Standards Australia New Zealand Act 1991.

The following standards are referenced in this document:

- Standard 1.2.1 Requirements to have labels or otherwise provide information
- Standard 1.2.2 Food identification requirements
- Standard 1.2.3 Mandatory warning and advisory statements and declarations
- Standard 1.2.5 Date marking of food
- Standard 1.2.7 Nutrition, health and related claims
- Standard 1.2.8 Nutrition information requirements
- Standard 1.3.1 Food additives
- Standard 1.3.3 Processing aids
- Standard 2.7.1 Labelling of alcoholic beverages and food containing alcohol
- Standard 2.7.3 Fruit wine, vegetable wine and mead

Authoritative versions of standards and the schedules referred to in those standards can be found here.

#### 1.4 DEFINITION OF CIDER

The definition of cider for labelling purposes is contained in Standard 2.7.3 of the Australia New Zealand Food Standards Code.

Note that a different definition of cider applies under tax legislation which can have implications for the tax treatment of certain products (see Box 1).

#### Standard 2.7.3 defines:

- cider as the fruit wine prepared from the complete or partial fermentation of juice or must of apples or apples and pears. Cider may contain no more than 25% pear.
- perry as the fruit wine prepared from the complete or partial fermentation of juice or must of pears or pears and apples. Perry may contain no more than 25% apple. Perry may be named pear cider.

As a fruit wine, cider and perry may also contain other fruits, vegetables, grains, cereals, sugars, honey, spices, alcohol and water.

Permitted additives and processing aids are set out in Standard 1.3.1 and Standard 1.3.3 and the schedules referred to in those standards.

Note that permitted processing aids include *an additive permitted at GMP* in addition to the substances listed in Schedule 18 (eg. calcium chloride which can be used in the production of keeved cider).

If you are planning to produce a product that contains new or unfamiliar ingredients, it is recommended you also consult:

- Standard 1.4.4 Prohibited and Restricted Plants and Fungi
- Standard 1.5.1 Novel Foods

#### Box 1: Definition of cider for taxation purposes

The A New Tax System (Wine Equalisation Tax) Act 1999 defines cider and perry as a beverage that is the product of the complete or partial fermentation of the juice or must of apples or pears and that does not contain any liquor or substance that gives colour or flavour (other than water or the juice or must of apples or pears) or any ethyl alcohol from any other source.

The Act defines a *fruit or vegetable wine* as a beverage that is the product of the complete or partial fermentation of the juice or must of fruit or vegetables (or products derived solely from fruit or vegetables) and that does not contain any liquor or substance that gives colour or flavour or any ethyl alcohol from any other source. In addition, a fruit or vegetable wine must be between 8-22% ABV. Products that meet these definitions of cider, perry and fruit wine are subject to the Wine Equalisation Tax, otherwise they are subject to excise under the *Excise Act 1901*.

A *flavoured cider* (such as cider with raspberry) does not meet the Wine Equalisation Tax definition of cider, but if it contains 8% ABV or above it may fall under the definition of a fruit or vegetable wine. A *flavoured cider* that contains less than 8% ABV will be excisable even though it can be labelled and sold as a cider.

Producers are encouraged to  $\underline{\text{contact the ATO}}$  to confirm tax arrangements.

# 1.5 OTHER REQUIREMENTS – HONEST AND RESPONSIBLE MARKETING

All cider labels must conform to the Australian Consumer Law (ACL). Under the ACL, cider labels cannot be false or be liable to mislead or deceive consumers. This includes the nature, the manufacturing process, the characteristics, the suitability for purpose and quantity of any goods. Any claims that you make must be able to be substantiated. It does not matter whether a false or misleading statement was intentional or not. Guidance is available on the ACCC's website.

Australia has a quasi-regulatory system, negotiated between industry and government, to ensure that alcohol is marketed in a responsible manner. Under the <u>ABAC</u> Responsible Alcohol Marketing Code, cider labels cannot encourage excessive or irresponsible consumption, or be aimed at minors. All alcohol advertising including product names and packaging should conform to the ABAC Code.

The ABAC Scheme has a <u>pre-vetting service</u> which offers a confidential, user-pays service to alcohol companies by assessing proposed advertisements and packaging against the ABAC Code at an early stage of development.

#### 1.6 CONSEQUENCES OF NON-COMPLIANCE

Failure to comply with mandatory labelling requirements can incur significant regulatory consequences, including product recall and prosecution by State and Territory food regulators.

Labels that are considered false, misleading or deceptive can also be the subject of regulatory enforcement by the ACCC.

Complaints about alcohol marketing are assessed in parallel by <u>Ad Standards</u> and by the Chief Adjudicator or Adjudication Panel of the ABAC Scheme. Adjudication decisions are published.

Failure to comply with labelling requirements may also have business consequences as retailers may refuse to stock your products.

#### 1.7 DISCLAIMER

This Guide has been prepared by Cider Australia to assist its members to understand the regulatory requirements for the labelling of cider products in Australia.

The information represents Cider Australia's interpretation of regulatory codes and standards as at October 2020. It does not constitute legal advice and members rely upon it at their own risk.

Cider Australia does not assume any liability of any kind for any inaccuracy, error, omission or other flaw in the information contained in this Guide, and for any loss and/or damage that may arise from reliance on the information presented.

#### 2. MANDATORY INFORMATION

The Australia New Zealand Food Standards Code requires that labels must be legible and prominent so they are distinct from the background, and in English.

## 2.1 PRODUCT DESCRIPTION

(Standard 1.2.2)

The Australia New Zealand Food Standards Code requires an appropriate name or description of the food on a label. There are no prescribed names but the description must convey the true nature of the product.

If a product contains ingredients that are not permitted in the production of cider, perry or fruit wine under Standard 2.7.3, then it must not be labelled or otherwise sold as cider, perry or fruit wine.

A food that is sold as a *cider*, *mead*, *perry*, a *fruit wine* or a *vegetable wine* must be cider, mead, perry, a fruit wine or a vegetable wine, as appropriate.

Perry may be named pear cider.

Where a product contains cider blended with another ingredient such as cherry prior to or post fermentation:

- a description such as cider with cherry or cider and cherry would be appropriate if apple is the primary or characterising ingredient
- a description such as cherry fruit wine with cider or cherry and apple fruit wine would be appropriate if cherry is the primary or characterising ingredient.

#### 2.2 ALCOHOL CONTENT

(Standard 2.7.1)

An alcohol content statement on the front or back label is required for any beverage containing more than 0.5% alcohol by volume (refer to Table 1 for acceptable statement formats).

Table 1: Format for alcohol content statements

Table 1. Format for all	conor content statements
PRODUCT ABV	REQUIREMENT
Alcoholic beverages containing 1.15% ABV or less  Beverages containing 0.5 – 1.15% ABV (ie fermented soft drinks)	Alcohol content must be expressed in words as follows: CONTAINS NOT MORE THAN X% ALCOHOL BY VOLUME
All foods containing more than 1.15% ABV	Alcohol content must be expressed in any of the following ways: ml/100g mL/100mL Percentage alcohol by volume (eg. 4.5% ABV)

The statement must be accurate to within +/-0.3% ABV for cider and perry, and +/-1.5% ABV for fruit wine (including sparkling forms) and fruit or vegetable wine products containing more than 6.5% ABV.

Decimal values must be represented with a decimal point and not a European decimal comma.

An alcoholic beverage which contains more than 1.15% ABV must not be represented as a low alcohol beverage.

#### 2.3 VOLUME STATEMENT

(National Trade Measurement Regulation 2009)

A volume statement must be present on the front label and be in the same direction as the branding.

The unit of measure must be represented in mL, cL or L.

The text height of the volume statement is dependent upon the package height (refer to Table 2 for text height requirements).

The volume statement must be at least 2mm from limits of the package and from the edges of any graphics or text.

It is recommended that the volume statement appears in a single field of vision with the alcohol content statement as well as the standard drinks statement.

Table 2: Volume statement – minimum size requirements

LARGEST PACKAGE DIMENSION	MINIMUM CHARACTER HEIGHT
120mm or less	2.0mm
Over 120mm but not over 230mm	2.5mm
Over 230mm but not over 360mm	3.3mm
Over 360mm	4.8mm

# 2.4 STANDARD DRINKS STATEMENT

(Standard 2.7.1)

Any cider above 0.5% ABV must state the number of standard drinks the package contains.

One standard drink is 10 grams of ethanol when measured at 20 degrees C.

Refer to Table 3 below to calculate the correct number of standard drinks. Always use standard rounding rules ie. 4.54 rounds to 4.5 and 4.56 rounds to 4.6.

Table 3: Standard drinks formula

To calculate Australian standard drinks, please use the following formula:				se the following
Volume of container	X	% Alcohol by volume	Х	0.789
				(specific gravity
(Litres)		(mL/100mL)		of ethanol)
For example, a 3	330mL l	bottle of cider at 4	.5% AB	V is calculated as:
0.33	Χ	4.5	Χ	0.789
(Litres)		(% Alc/Vol)		
This rounds to 1	.2 stan	dard drinks*		

<sup>\*</sup> Products containing less than 10 standard drinks must be rounded to 1 decimal place and products containing more than 10 standard drinks to the nearest whole number.

The number of drinks can be indicated as a statement (ie. CONTAINS APPROX. X.X STANDARD DRINKS) or a standard drinks symbol with the correct number of drinks inserted.

Any glass symbol can be chosen for cider. Each symbol has a minimum height and clear zone requirement.







#### 2.5 ALLERGEN INFORMATION

(Standard 1.2.3 and Standard 1.2.1)

Allergens that may be present in cider that need to be listed include:

- Added sulphites in concentrations of 10 mg/kg or more
- Cereals containing gluten and their products, namely, wheat, rye, barley, oats and spelt and their hybridized strains
- Crustacea and their products
- Egg and egg products

- Fish and fish products (except for isinglass derived from swim bladders and used as a clarifying agent)
- Lupins and lupin products
- Milk and milk products except for alcohol distilled from whey
- Peanuts and peanut products
- Sesame seeds and sesame seed products
- Soybeans and soybean products
- Tree nuts and tree nut products except for coconut from the fruit of the palm Cocos Nucifera.

Allergens must be declared if they are present whether as an ingredient, an ingredient of a compound ingredient, a food additive or component of a food additive or a processing aid or component of a processing aid.

Any statement must be set out legibly and prominently such as to afford a distinct contrast to the background and in the English language. There is no minimum size of type for an allergen declaration.

# 2.6 SUPPLIER & PACKER NAME AND ADDRESS (Standard 1.2.2)

The label must include the name and address of the supplier.

The supplier may be the manufacturer, packer, vendor or importer.

The label must include a physical business address in either Australia or New Zealand.

The National Trade Measurement Regulations also require the package to be marked with the name and physical address (not a PO Box) of the person who packed the product or on whose behalf it was packed. In general, this will be the same person as the *supplier*.

#### 2.7 LOT IDENTIFICATION

(Standard 1.2.2)

Lot identification must appear on all packaging. The format is not prescribed and need only have meaning to the producer.

Lot means an amount of food that the producer identifies as having been prepared, or from which foods have been packaged or otherwise separated for sale, under essentially the same conditions, for example from a particular preparation or packaging unit, and during a particular time ordinarily not exceeding 24 hours.

Lot identification means a number or other information that identifies the premises where the food was prepared or packaged and the lot of which the food is a part.

Where a single batch is produced and bottled at one time, existing information on the label may adequately identify

the lot (ie. the product name and vintage).

Where a manufacturer has multiple sites or used multiple production lines, the best before dates are not considered to indicate lot identification. Otherwise it is acceptable to state: *Lot Code: See Best Before Date.* 

#### 2.8 BEST BEFORE DATE

(Standard 1.2.5)

The label must include a best before date unless the best before date is two years or more. See Table 4 for acceptable date formats.

The best before date is the date at which the cider will remain fully marketable and will retain any specific qualities for which express or implied claims have been made.

The best before date must use the words *Best Before* accompanied by the date or a reference to where the date is located on the packaging. For example, FOR BEST BEFORE SEE SHOULDER OF BOTTLE.

The best before date must be clearly legible and indelible on all saleable units.

Table 4: Acceptable best before date formats

SHELF LIFE OF PRODUCT	ACCEPTABLE DATE FORMATS
Under 3 months	Best Before: 23 12 2015
	Best Before: 23 Dec 2015
	Best Before: Dec 23 2015
3 months or more	Best Before: Dec 2015
	Best Before: 12 2015

### 2.9 COUNTRY OF ORIGIN

(ACCC Country of Origin Food Labelling Information Standard 2016)

Cider labels must carry a country of origin text statement about where the food was grown, produced or made (see Table 5).

Table 5: Country of origin statement requirements

GROWN IN	PRODUCED IN	MADE IN
	PRODUCT OF	
Can only be used	Can only be used	Can be used if the
if the cider	if the cider	product underwent
contains	contains	its last substantial
ingredients grown	ingredients	transformation* in
exclusively in a	sourced	that country. The
particular country	exclusively from a	ingredients can be
	particular country	sourced from
		another country.

<sup>\*</sup> Fermenting juice to produce cider is considered a *substantial* transformation.

This statement must be legible and prominent on each single unit, multi-pack or carton.

The country of origin regulations are complex and members are encouraged to refer to the Country of Origin

Information Standard or ACCC <u>Guide</u> to determine the statement that applies to a product.

Alcoholic beverages containing more than 0.5% ABV are non-priority foods and are not required to display the kangaroo and bar logos within the Country of Origin Information Standard. You can voluntarily use the logos, however, there are stringent guidelines for use of these logos which must be complied with even if used voluntarily.

Carbonated fruit drinks such as sparkling apple juice are included in the non-priority *soft drink and sports drink* category within the Country of Origin Information Standard and are not required to display the kangaroo and bar logos. However, non-carbonated fruit drinks are a priority food and are required to display the logos.

#### 2.10 10C REFUND STATEMENT

(Each State/Territory has its own Container Deposit Scheme rules)

It is a requirement in various states and territories that the individual beverage container display the following 10c refund statement. Each product must first be registered with the relevant state EPA.

 10c refund at collection depots/points in participating State/Territory of purchase

It is recommended the numeric 10 have a minimum text height of 3mm and the smallest letter in the wording a minimum text height of 1.5mm. These heights are mandated in some states.

A minimum 3mm *free space* boundary around the refund marking is also recommended.

The statement should go on the bottle/can only, not the multi-pack or carton.

#### 2.11 BARCODE

Some Container Deposit Schemes have mandatory barcode requirements. Retailers may also have specific barcode requirements for packaging (for example, see <a href="Endeavour">Endeavour</a> Drinks Group barcode requirements).

Cider Australia recommends that containers have EAN-13 barcodes that meets the minimum GS1 standards:

- minimum 80% magnification (target 100%)
- adequate light margins either sides of the bars
- truncation not recommended.

Cider Australia also recommends you test your label for GS1 compliance prior to printing. For more information see www.gs1au.org

#### 2.12 PREGNANCY WARNING LABEL

All beverages containing more than 1.15% ABV that are to be made available for retail sale must display a pregnancy warning (see FSANZ website for requirements).

The form of the warning depends on the size of the container and it must appear on all individual units and outer packaging that is suitable for retail sale.

A pregnancy warning mark is required on containers with a volume above 200mL:



The size of the mark depends on the volume of the container. The colours red, white and black must be used as shown. 3mm clear space is required around the solid border.

A pregnancy warning pictogram is required on containers with a volume not over 200mL:



Businesses have three years from 31 July 2020 to implement the label requirements.

#### 3. OPTIONAL INFORMATION

#### 3.1 BRAND NAME

Retailers generally require that the brand name appears on the front of the label. A clear brand name also assists consumers identify the manufacturer.

# 3.2 NUTRITION CONTENT OR HEALTH CLAIM (Standard 1.2.7 and Standard 1.2.8)

Alcoholic beverages containing 1.15% ABV or above cannot carry a nutrition content or a health claim except for a nutrition content claim about energy content, carbohydrate content or gluten content.

In order to make an energy, carbohydrate or gluten content claim, certain elements must also be included on a label (see Table 6).

Table 6 – Information to support nutrition claims

NATURE OF CLAIM	REQUIRED ELEMENTS ON LABEL		
Energy/	<ul> <li>A nutrition information panel (NIP)</li> </ul>		
carbohydrates/	<ul> <li>Comparisons must meet the</li> </ul>		
sugars	requirements in Schedule 4 to the		
	Code, for example terms such as		
(Standard 1.2.8 and	reduced or light/lite will only be		
Schedule 4)	permitted where the cider contains at		
	least 25% less energy/carbohydrate		

	than the same amount of the reference food.
Gluten (Standards 1.2.7, 1.2.8 and Schedule 4)	<ul> <li>A NIP is required for a low gluten claim. For a product to be labelled as low gluten, it must contain no more than 20mg gluten per 100g.</li> <li>A NIP is not required for a gluten-free claim. For a product to be labelled as gluten free it must not contain:         <ul> <li>detectable gluten, or</li> <li>oats or oat products, or</li> <li>cereals containing gluten that have been malted, or products of such cereals.</li> </ul> </li> </ul>

# 3.3 NUTRITION INFORMATION PANEL (NIP) (Standard 1.2.8)

Cider labels are not required to list ingredients (except if making a permitted nutrition content claim – see 3.2).

If you do wish to include this sort of information on a label, you will need to comply with all the requirements in the Australia New Zealand Food Standards Code. See FSANZ website for more information.

# 3.4 SORBITOL STATEMENT

(Standard 1.2.3)

Pear, and therefore perry, contains high levels of naturally occurring sorbitol which does not ferment.

The concentration of sorbitol in perry is well below the threshold for a mandatory advisory statement under Standard 1.2.3. However, the total amount of sorbitol consumed at one time by a drinker of perry may be sufficient to cause an adverse reaction (laxative effect) in some people.

Producers are encouraged to voluntarily advise consumers about the sorbitol content of perry through the inclusion of the following statement (or similar) on labels:

#### Real pears naturally contain Sorbitol

### 3.5 100% AUSTRALIAN GROWN TRUST MARK Cider Australia has developed a trust mark to call out what makes Australian craft ciders unique – the fact they are made with 100% Australian grown apples or pears.

The trust mark may be displayed on ciders made from 100% Australian grown ingredients and is only available to eligible members of Cider Australia (who maintains a register of approved users). Visit the Cider Australia <a href="website">website</a> to find out more about the trust mark.



#### 3.6 RECYCLE LOGO

If the container is made from recyclable materials, for example glass or aluminium, the labelling may display a recycle symbol. Note that a recycle symbol may be mandatory for some retailers.

Visit the Planet Ark <u>website</u> for more information about recycling symbols.

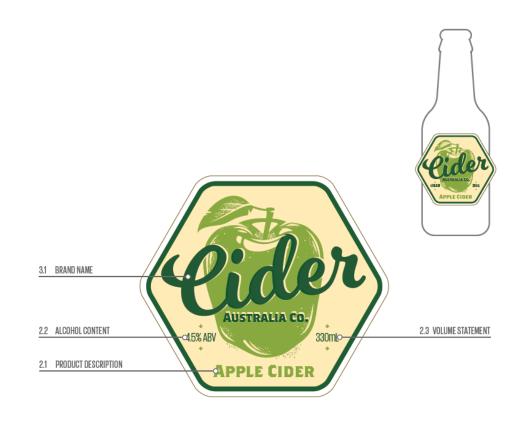
#### 3.7 RESPONSIBLE DRINKING MESSAGING

Cider Australia supports the use of responsible drinking messaging on cider packaging and other DrinkWise initiatives.

Information on messaging can be found on the DrinkWise website.

## 4. CHECKLIST - SINGLE UNIT

MANDATORY INFORMATION •				
2.1	Product description			
2.2	Alcohol content			
2.3	Volume statement			
2.4	Standard drinks statement/graphic			
	(Contains approximately X.X			
	standard drinks)			
2.5	Allergens			
2.6	Supplier & Packer name & address			
2.7	Lot identification			
2.8	Best Before date			
2.9	Country of Origin			
2.10	10c refund statement			
2.11	Barcode			
2.12	Pregnancy warning			
OPTIO	ONAL INFORMATION			
3.1	Brand name			
3.2	Nutrition content claim			
	(energy/carbohydrate/gluten only)			
3.3	Nutrition Information Panel (NIP)			
3.4	Sorbitol statement			
3.5	100% Australian Grown trust mark			
3.6	Recycle logo			
3.7	Responsible drinking messaging			
HONE	ST AND RESPONSIBLE MARKETING			
1.4	Meets FSANZ product definition			
3.2	No health claims			
2.2	No low alcohol/reduced alcohol claims			
1.5	No false/misleading/deceptive claims			
	(ACCC)			
1.5	Responsible marketing (ABAC)			





## 5. CHECKLIST – MULTI-PACK

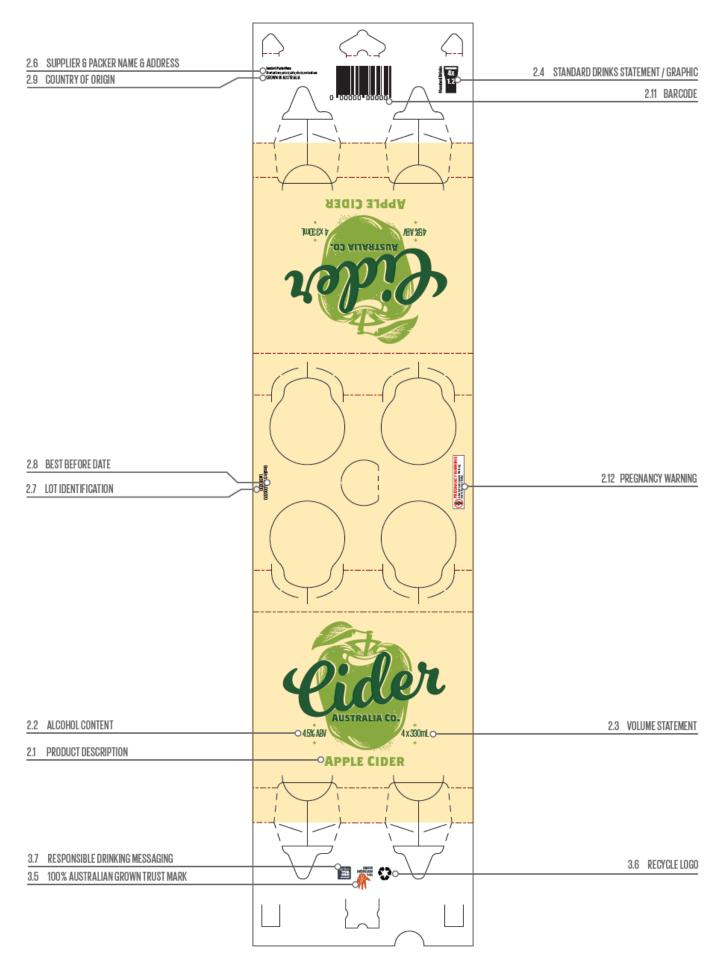
If a multi-pack is to be sold as a single unit, the outer packaging must include the same mandatory information as a single unit label and a different barcode to the single units.

If the multi-pack may be split and individual packages sold separately, then these should also be fully labelled.

The information on the outer and inner packaging must be consistent.

The total volume of the inner packages or the number of packages and the volume of each (for example, 4 x 330mL) also must appear.

			,	
		ORY INFORMATION	V	
	2.1	Product description		
	2.2	Alcohol content		
	2.3	Volume statement (eg. 4 x 330mL)		
	2.4	Standard drinks statement/graphic		
		(Each bottle/can contains approximately		
		X.X standard drinks)		
	2.6	Supplier & Packer name & address		
	2.7	Lot identification		
	2.8	Best Before date		
	2.9	Country of Origin		
	2.11	Barcode		
	2.12	Pregnancy warning		
	OPTIONA	L INFORMATION		
	3.1	Brand name		
	3.2	Nutrition content claim		
		(energy/carbohydrate/gluten only)		
	3.3	Nutrition Information Panel (NIP)		
	3.4	Sorbitol statement		
	3.5	100% Australian Grown trust mark		
	3.6	Recycle logo		
	3.7	Responsible drinking messaging		
HONEST AND RESPONSIBLE MARKETING				
	1.4	Meets FSANZ product definition		
	3.3	No health claims		
	2.2	No low alcohol/reduced alcohol claims		
	1.5	No false/misleading/deceptive claims		
		(ACCC)		
	1.5	Responsible marketing (ABAC)		



#### 6. CHECKLIST - CARTON

Outer packaging does not require full labelling if it is for transportation and distribution only and is intended to be removed prior to retail sale. In such cases, only the product name, lot identification, supplier details and quantity details are required.

If a carton is to be sold as a single unit, the outer packaging must include the same mandatory information as a single unit label.

If the carton may be split and individual packages sold separately, then these should also be fully labelled.

The information on the outer and inner packaging must be consistent.

The total volume of the inner packages or the number of packages and the volume of each (for example, 24 x 330mL) also must appear.

Some major retailers have additional requirements and requests (for example, see 6.1 gross weight). It is recommended you check before printing where possible.

#### 6.1 GROSS WEIGHT

Some retailers require the gross weight of carton packaging to be displayed on two adjacent sides of the carton, and the top of the carton. If the gross weight of the carton exceeds 10kg a CAUTION LIFT symbol must be displayed on all six sides of the carton. If the gross weight of the carton exceeds 16kg, some retailers require a risk assessment to be conducted prior to the product being accepted.

MANDATORY INFORMATION		
2.1	Product description	
2.2	Alcohol content	
2.3	Volume statement (eg. 24 x 330mL)	
2.4	Standard drinks statement/graphic	
	(Each bottle/can contains approximately	
	X.X standard drinks)	
2.6	Supplier & Packer name & address	
2.7	Lot identification	
2.8	Best Before date	
2.9	Country of Origin	
2.11	Barcode	
2.12	Pregnancy warning	
<b>OPTIONAL</b>	INFORMATION	
3.1	Brand name	
6.1	Gross weight of carton	
3.2	Nutrition content claim	
	(energy/carbohydrate/gluten only)	
3.3	Nutrition Information Panel (NIP)	
3.4	Sorbitol statement	
3.5	100% Australian Grown trust mark	
3.6	Recycle logo	
3.7	Responsible drinking messaging	
<b>HONEST AN</b>	ND RESPONSIBLE MARKETING	
1.4	Meets definition of cider/perry	
3.3	No health claims	
2.2	No low alcohol/reduced alcohol claims	
1.5	No false/misleading/deceptive claims (ACCC)	
1.5	Responsible marketing (ABAC)	П
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