



Spirits New Zealand

Submission - Proposal P1031: Allergen
Labelling Exemptions

Prepared for the Food Safety Authority Australia New Zealand
September 2015



Introduction

Spirits New Zealand (formerly the Distilled Spirits Association of New Zealand) is the national trade organisation representing New Zealand's leading producers, distributors, brand owners, importers and exporters of premium spirits and spirit-based drinks.

Spirits NZ members represent over 98% of spirit industry interests in New Zealand and are:

Bacardi New Zealand Holdings Ltd,
Beam Suntory,
Brown-Forman,
Diageo,
Hancocks,
Independent Liquor,
Lion,
Moet-Hennessy, and
Pernod Ricard New Zealand.

In addition we have three associate members who are Anchor Ethanol, EuroVintage and Federal*Geo.

Please do not hesitate to contact me to discuss anything in this document in more detail.

A handwritten signature in blue ink that reads "Robert Brewer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Robert Brewer
Chief Executive
Spirits New Zealand Inc
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Submission

We write in support of the proposed changes/clarifications to the allergen labelling provisions in Standard 1.2.3 – *Information requirements – warning statements, advisory statements and declarations* as applicable to beverages derived from alcohol distilled from whey or from grains such as wheat. In particular we support the changes proposed for sub paragraphs 4(1)b(i) and (v) exempting alcohol products distilled from whey and wheat from the need for allergen labelling.

As you note in section 2.1.4 of your submission documentation:

There is general scientific agreement that, in a properly controlled distillation process, non-volatile substances such as lactose and proteins from whey are not found in the [alcohol] distillate. On this basis, distilled alcohol (and products made from distilled alcohol, such as vinegar) would not contain protein. The available analytical data confirm that protein is undetectable (i.e. <1mg/kg) in distilled ethanol from whey and from wheat. The risk assessment concluded that alcohol distilled from wheat or from whey presents negligible risks to susceptible individuals.

We believe that exempting producers of distilled alcohol products in Australia and New Zealand from additional labelling requirements is a sensible, appropriate and aligned response to this issue as per other jurisdictions including the EU, Switzerland, Singapore and Argentina.