

1 March 2024

Dear Jenny,

**RE: REQUEST FOR INFORMATION ON THE LABELLING OF ALCOHOLIC
BEVERAGES**

Allergy & Anaphylaxis Australia has responded to the questionnaire in Appendix 1.

1. Mandatory labelling requirements

A&AA supports the mandatory labelling requirements for ingredients, including common food allergens, on all alcoholic beverages. We do not agree that there should be an exemption for ingredient labelling for low alcohol beverages. The ingredient/allergen information is essential for consumers to make an informed decision on whether the alcoholic beverage is safe to consume. Without this information, the product could be a risk to the health of consumers.

A&AA does not have the expertise to comment on the mandatory labelling requirements for other nutrition and health related information, except for claims that alcoholic beverages are vegan. The term vegan is currently unregulated, with only the International ISO standard, that certifies that animal products have not been used during the manufacturing process. This does not assist consumers with food allergy who require foods to be free of their allergen. A&AA is concerned that despite our ongoing communication, consumers, primarily with milk and egg allergy, see vegan food as a 'safe food'.

**2. Options for the development of specific provisions on mandatory labelling
tailored to alcoholic beverages**

A&AA supports developing a new Codex standard for alcoholic beverages as we believe alcoholic beverages are unique in their composition and health impact and therefore differ from food. Our belief is that some of the mandatory requirements for nutrition related information and claims are not relevant to alcoholic beverages, while communication of health-related information specific to alcohol should be present.

**3. To address comments made by some Codex members since CCFL44 on
whether alcoholic beverages fall under the Codex definition of food as stated in the
Procedural Manual and the Codex General Standard for the Labelling of
Prepackaged Foods**

A&AA disagrees with revising the standard definition of food to include alcoholic beverages, in addition to drinks, as we don't believe consumers and food industry staff would recognise alcohol as a food. Alcohol has unique properties and is not consumed as a food with nutritional benefit. It differs from other 'drinks' in that it can cause harm.

A&AA agrees with developing a separate standard definition of alcoholic beverages. This should include a definition of non-alcoholic drinks that are labelled with information on ingredients, including mandatory food allergen content.

4. Additional comments regarding alcoholic beverage labelling.

A&AA is aware of the use of common food allergens in liqueurs, spirits, wine and beer.

In the case of food allergy, it is critical that food allergens are labelled, as alcohol containing an allergen can trigger anaphylaxis while impeding the person's judgement and potentially delay emergency care.

A&AA is receiving an increasing number of enquiries from consumers who are concerned about the lack of food allergen information available on alcoholic beverages and the lack of clarity on some that may contain an allergen. E.g. peanut flavour. Additionally, they are disappointed that the allergen information is not easily identifiable, as it is not always on the back label. It can appear on the front of the label or on external packaging. For example, when beer or spirit mixers are purchased as a multi pack, the individual bottles/cans sometimes have little or no ingredient/allergen information as this only is detailed on the external cardboard packaging. There are also reports of the allergen information appearing on the glass, making it difficult to see. There is further confusion when the allergen information online is not consistent with allergen information that may appear on the packaging.

A&AA is concerned about the use of undefined ingredients listed on alcoholic beverages, such as "love". This is not helpful for consumers and provides little faith that companies are taking their labelling obligations seriously. Furthermore, the use of terms such as "hints of hazelnut", is unclear. This does not provide clarity for the consumer about whether the alcoholic beverage contains hazelnut as an allergen or it is chemical-based flavour.

A&AA supports the clear communication of common food allergens in alcoholic beverages in line with Plain English Allergen Labelling. The source of truth should be in an ingredient list (not anywhere on the label) and where multi packs are purchased, on the back of individual items as well as on external packaging.