



BREWERS
ASSOCIATION

Brewers Association of Australia & New Zealand Inc

**Submission to
Food Standards Australia New Zealand**

P1031 Allergen Labelling Exemption

September 2015

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The Brewers Association of Australia and New Zealand (Brewers Association) comprises Australian members, Carlton & United Breweries, Coopers and Lion Co, which together produce and distribute around 95% of domestically brewed beer, and New Zealand members, DB Breweries and Lion Co, who are similarly the major brewers in the New Zealand market.

Its members have been and remain makers of safe and wholesome beers for generations of Australian and New Zealand consumers and recognise the importance of having appropriate and enforceable standards for food products. They support Food Standards Australia and New Zealand in its role in developing and refining the Food Code to ensure not only public health and safety but also assisting the growth of the food industry by minimising regulatory burdens.

The Brewers Association therefore welcomes the opportunity to provide comment on Proposal P1031.

Discussion

The Brewers Association's Members are well aware of the continuing increase in food intolerance and allergenicity and support the need for labelling which provides the appropriate information to consumers. It is clear however that there are situations where labelling can in fact be misleading and reduces the options of consumers with no apparent benefit. It is therefore necessary that in these cases the requirements are reconsidered and changes made to the Code.

The particular cases raised in P1031 are indeed examples of regulation (and cost) with no consumer benefit. Removal of the need to label will simplify requirements for manufacturers and potentially allow substitution or interchangeability of ingredients with possible benefit to consumers. It also will increase consumer choice.

The Brewers Association is of the view therefore that this Proposal:

- Does not adversely impact on consumer health and safety
- Offers benefit to consumers by increasing product choice
- Assists manufacturers by simplifying increasing demands on label space
- Improves manufacturing flexibility
- Is generally consistent with international approaches.

The Brewers Association is therefore supportive of the Proposal.