

DISTILLED
SPIRITS
COUNCIL
OF THE
UNITED
STATES

September 22, 2015

Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610
Australia

Food Standards Australia New Zealand
PO Box 10559
The Terrace Wellington 6143
New Zealand

Email: submissions@foodstandards.gov.au

RE: Submissions – Proposal P1031: Allergen Labeling Exemptions

Dear Sir/Madam:

On behalf of the Distilled Spirits Council of the United States, Inc., we welcome the opportunity to provide our views regarding the recent proposal concerning proposed allergen labeling exemptions. The Distilled Spirits Council is the national trade association representing U.S. producers, marketers, importers and exporters of distilled spirits products. Our members export to over 130 countries worldwide, including Australia and New Zealand.

Specifically, we write in support of the proposal to exempt distilled spirits products made from wheat or whey from mandatory allergen declarations, in essence reaffirming the existing exemptions that are already in place. As you know, numerous studies, analytical data and empirical evidence demonstrate that, whether cereal grains, milk (whey) and/or nuts are used in the production of distilled spirits products, proteins, peptides or fragments are not carried over into the distillate. Accordingly, in addition to Australia and New Zealand, the EU, Argentina, Switzerland and Singapore, have exempted distillates made from cereals, whey (milk) and/or nuts from their allergen labeling requirements.

Thank you again for the opportunity to provide comments on the proposal, and we would be pleased to amplify and/or clarify any of these points as needed.

Sincerely,

[Redacted Signature]

Senior Vice President
International Issues and Trade

