



### ALLERGEN LABELLING FOR THE EU

#### 1 Introduction

This newsletter consolidates previous information on the indication of potential allergens on wine for the European Union.

#### 2 The potential allergens which must be indicated

The list of ingredients is attached as ANNEX A. Exemptions are also indicated therein. For example, fish gelatine or isinglass used as a fining agent in wine, need not be shown in your allergen statement.

#### 3 The statement

Article 3(3) of EU Regulation 753/2002 requires that the potential allergens in your wine must be listed, preceded by the word "Contains". For example, "Contains sulphites and egg". We have been in constant contact with the EU Commission to try and ascertain exact wording (and translations) to be indicated, but with limited success. At this stage we have been assured that the expressions "Contains milk", "Contains egg" and "Contains wheat" will be accepted. Thus, your label could read: "Contains sulphites, egg, milk and wheat".

The EU Commission has indicated that other expressions (such as "milk proteins", "casein (milk)", "egg proteins", "albumin (egg)", "lysozyme (egg)" and "wheat proteins") should be fine, but a final decision thereon is still in the pipeline.

As detailed draft regulations on above are only expected during March 2009, which is probably too late for many of you, we recommend that you only use "sulphites", "milk", "egg" and "wheat", as is applicable.

#### 4 When

Any of the listed ingredients or an ingredient originating from a listed ingredient, used in the production of wine and still present in the finished product, even if in altered form, must be indicated with a clear reference to the name of such ingredient. If in doubt whether the ingredient is present or not, indicate the ingredient.

##### Sulphites

The requirement to indicate sulphites applies only if the finished wine contains more than 10 milligrams per litre of sulphur dioxide and sulphites, expressed as SO<sub>2</sub> (which most wines will contain).

The indication of sulphites has been compulsory from 25 November 2005. All wines labelled from that date must carry the statement. Wines labelled before 25 November 2005 may be exported to the EU without the sulphites statement while stocks last.

##### The other ingredients

The other listed ingredients must be indicated as from 31 May 2009, but products without these ingredients placed on the market or labelled before 31 May 2009, may be marketed until stocks are exhausted. The EU has decided not to extend this deadline.

## 5 Language

The allergen statement must be in the language(s) stipulated by the destination market. Therefore, if your wine is destined for a number of different markets within the EU, with varying language requirements, the allergen statement will either need to be in the specific language of each market or the label will need to include the statement in all the languages necessary for the various markets. You may show the statement in as many languages as you wish.

See ANNEX B for the languages stipulated. This annex also contains the contact particulars of the national competent authority in each member state. Any query regarding the language(s) for the allergen statement may be addressed to such a competent authority.

ANNEX C gives you the expression "Contains sulphites" in the various EU languages. Translations of the other potential allergens are not available - please consult with the applicable national competent authority or your importer/agent in this regard.

## 6 Where

As a general rule, compulsory particulars must be grouped in the same visual field on the container. However, this rule does not apply to the importer statement, the lot number and the allergen statement. Thus, the allergen statement can be inside or outside the visual field in which the other compulsory particulars appear.

## 7 How

The allergen statement must be presented in easily readable, indelible characters large enough to stand out well against the ground on which they are printed and clearly distinguishable from all other (written and graphic) content of the labelling.

## 8 Use in South Africa

To our knowledge nothing prevents you from using the allergen statement on labels destined for the local market.

  
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Disclaimer: This document has been prepared primarily for the general information of the South African wine industry and does not represent any form of legal advice. Accordingly, readers should not rely on the comments contained herein, whether express or implied, and should consult the legislation concerned and obtain specific advice on these matters from their own legal advisers. Writer or his employer does not accept responsibility for the accuracy or completeness of any recommendations, comments, information or advice contained herein, and will not be held liable for any loss or damage that may arise as a result of the use of the information.



1. Cereals containing gluten (i.e. wheat, rye, barley, oats, spelt, kamut or their hybridised strains) and products thereof, except:
  - (a) wheat-based glucose syrups including dextrose <sup>(1)</sup>;
  - (b) wheat-based maltodextrins <sup>(1)</sup>;
  - (c) glucose syrups based on barley;
  - (d) cereals used for making distillates or ethyl alcohol of agricultural origin for spirit drinks and other alcoholic beverages.
2. Crustaceans and products thereof.
3. Eggs and products thereof.
4. Fish and products thereof, except:
  - (a) fish gelatine used as carrier for vitamin or carotenoid preparations;
  - (b) fish gelatine or Isinglass used as fining agent in beer and wine.
5. Peanuts and products thereof.
6. Soybeans and products thereof, except:
  - (a) fully refined soybean oil and fat <sup>(1)</sup>;
  - (b) natural mixed tocopherols (E306), natural D-alpha tocopherol, natural D-alpha tocopherol acetate, natural D-alpha tocopherol succinate from soybean sources;
  - (c) vegetable oils derived phytosterols and phytosterol esters from soybean sources;
  - (d) plant stanol ester produced from vegetable oil sterols from soybean sources.
7. Milk and products thereof (including lactose), except:
  - (a) whey used for making distillates or ethyl alcohol of agricultural origin for spirit drinks and other alcoholic beverages;
  - (b) lactitol.
8. Nuts, i.e. almonds (*Amygdalus communis* L.), hazelnuts (*Corylus avellana*), walnuts (*Juglans regia*), cashews (*Anacardium occidentale*), pecan nuts (*Carya illinoensis* (Wangenh.) K. Koch), Brazil nuts (*Bertholletia excelsa*), pistachio nuts (*Pistacia vera*), macadamia nuts and Queensland nuts (*Macadamia ternifolia*), and products thereof, except:
  - (a) nuts used for making distillates or ethyl alcohol of agricultural origin for spirit drinks and other alcoholic beverages.

<sup>(1)</sup> And products thereof, insofar as the process that they have undergone is not likely to increase the level of allergenicity assessed by the EFSA for the relevant product from which they originated.

9. Celery and products thereof.
10. Mustard and products thereof.
11. Sesame seeds and products thereof.
12. Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/litre expressed as SO<sub>2</sub>.
13. Lupin and products thereof.
14. Molluscs and products thereof.'

**LANGUAGES STIPULATED BY THE EU STATES FOR THE ALLERGEN STATEMENT**

<b>Member State</b>	<b>Language(s)</b>	<b>Competent Authority</b>
Austria	German	Bundesministerium für Land- und Forstwirtschaft Stubenring 12 – 1010 Wien Tel.: +431 71100 2840 - Fax: +431 71100 2725
Belgium	Dutch or French or German or English	Ministère Santé Publique - Tel.: +32 2 5247371 Ministère Economie – Tel.: +32 2 2777481
Bulgaria	Bulgarian	Executive Agency on vine and wine 125, Tsarigradsko chaussee, blvd, bl.1 1113 Sofia, Bulgaria tel: +359 2 9708 111 fax: +359 2 9708 122
Cyprus	Greek	Wine Products Council P.O. Box 71011 – 3840 Limassol Tel.: +357 25892892 – Fax: +357 25819305 e-mail: cwpc@wpc.org.cy
Czech Republic	Czech	Ministerstvo zemědělství České republiky, oddělení pro víno Tel.: +420 221812 332 e-mail: heimlich@mze.cz
Denmark	Danish or Swedish	Danish Veterinary and Food Administration Mørkhøj Bygade 19 – 2860 Søborg Tel.: +45 33 95 60 00 e-mail: fa04@fvst.dk
Estonia	Any EU language	Ministry of Agriculture Tel.: +372 6256 512
Finland	Finnish <u>and</u> Swedish (Swedish can be replaced by Danish or Norwegian)	National Product Control Agency for Welfare and Health Säästöpankinranta 2 A – 00531 Helsinki Tel.: +358 9 3967 2761 - e-mail: satu.pekkarinen@sttv.fi
France	French or English	Ministère de l'Economie Bureau D2, Teledoc 251, Boulevard Vincent Auriol n° 59 75703 Paris Cedex 13 Tél. +33(0)144972907 – Fax +33(0)144973039 e-mail: d2@dgccrf.finances.gouv.fr
Germany	German	Referat für Wein, Marktangelegenheiten bei Hopfen, Bier, Mineralwasser und Erfrischungsgetränken Rochusstraße 1 _ 53123 Bonn Tel: +49 228 529 3402 - Fax: +49 228 529 3375
Greece	Greek	Ministry of Agriculture Tel. +30 210 2124173 e-mail: ax2u043@minagric.gr
Hungary	Hungarian	National Institute for Wine Qualification Bem József tér 2 - 1027 Budapest Fax: 0036 1 2124978
Ireland	English	Food Division, Department of Agriculture and Food Kildare Street, Dublin 2 Tel: +353 1 6072303
Italy	Italian	Ministero Attività Produttive Tel.: +39 06 47887729 – Fax: +39 06 47887797 e-mail: giuseppe.degiovanni@minindustria.it

<b>Member State</b>	<b>Language(s)</b>	<b>Competent Authority</b>
Latvia	Latvian	Ministry of Economics – Department of Internal Market Consumer Rights Protection Division Brivibas str. 55, Riga, LV – 1519 Tel.: +37 1 7013101 e-mail: pasts@em.gov.lv
Lithuania	Lithuanian	Ministry of Agriculture Gedimino av. 19 – 01103 Vilnius Fax: +370 5 2391212 e-mail: zum@zum.lt
Luxembourg	French or German or Luxembourgian	Institut Vitivinicole B.P. 50 – 5501 Remich Tel.: +35 2 236121
Malta	Maltese or English or Italian	Ministry for Rural Affairs and the Environment Valletta e-mail: randall.caruana@gov.mt tel.: 00356 25904151 fax: 00356 25904225
Poland	Polish	Wydział Kontroli Jakości Handlowej Artykułów Rolno-Spożywczych i Środków Produkcji tel.: +48 22 6232915 e-mail: dbalinska@ijhars.gov.pl
Portugal	Portuguese or English or French or Spanish	Instituto da Vinha do Vinho Rua Mouzinho da Silveira n° 5 - 1250 165 Lisboa Tel.: +351 213 506 710 - Fax: +351 213 534 820 e-mail: presidencia@ivv.min-agricultura.pt
Romania	Romanian	Ministry of Agriculture and Rural Development State Inspection for Vine and Wine Technical Control
Slovakia	Slovak	Ministry of Agriculture Dobrovičova 12 – 81266 Bratislava e-mail: adriana.varinska@land.gov.sk
Slovenia	Slovenian	Ministrstvo za Kmetijstvo Dunajska 58 - 1000 Ljubljana Tel.: ++386 1 478 9000 Fax.:++386 1 478 9021 e-mail: gp.mkgp@gov.si
Spain	Spanish or English or French or Italian or Portuguese	Ministerio de Sanidad y Consumo Paseo del Prado, 18-20. E-28071 – Madrid Tel. +34 91 596 10 00
Sweden	Swedish or English	National Food Administration Box 622 – 75126 Uppsala Tel.: 018-175593 e-mail: amoa@slv.se
The Netherlands	Dutch	Voedsel-en Warenautoriteit (VWA) CentreCourt - Prinses Beatrixlaan 2 - 2595 AL Den Haag Telefoon (070) 448 48 48 - Fax (070) 448 47 47 e-mail: info@vwa.nl
United Kingdom	English	Food Standards Agency Room 115, Aviation House, 125 Kingsway, London Phone: +44 (0) 207 276 8192 e-mail: theresa.ekong@foodstandards.gsi.gov.uk

**"CONTAINS SULPHITES" IN EU LANGUAGES**

Bulgarian	Съдържа сулфити
Czech	Obsahuje siřičitany
Danish	Indeholder sulfitter
Dutch	Bevat sulfieten
English	Contains sulphites
Estonian	Sisaldab sulfitid
Finnish	Sisältää sulfiitteja
French	Contient sulfites
German	Enthält Sulfite
Greek	Περιέχει θειώδη
Hungarian	Tartalmaz szulfitok
Italian	Contiene solfiti
Latvian	Satur sulfīti
Lithuanian	Sudėtyje yra sulfitai
Maltese	Fih sulfiti
Polish	Zawiera siarczyny
Portuguese	Contém sulfitos
Romanian	Conține sulfiți
Slovenian	Vsebuje sulfit
Slovak	Obsahuje siřičitany
Spanish	Contiene sulfitos
Swedish	Innehåller sulfiter