**25 May 2012** 2 of 2012

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### **INFORMATION**

#### **EU ALLERGENS LABELLING – EGG AND MILK PRODUCTS**

Contrary to our previous advice and despite representations by South Africa and other Southern Hemisphere countries, it now seems as if the deadline of 30 June 2012 will not be postponed. The information below must not be regarded as authoritative. It is based on unofficial translations of draft EU legislation, which has now gone through several stages, but must still be finally approved. Further representations should be made when this proposed legislation is notified under WTO (World Trade Organisation) procedures.

## 1 Scope and date of application

- (a) All wine from the harvests of 2011 and before will be exempt from mandatory egg/milk allergen labelling.
- (b) Wine of the 2012 harvest, labelled <u>before</u> 30 June 2012, will also be exempt.
- (c) Wine of the 2012 harvest, labelled after 30 June 2012, will not be exempt.

# 2 Determination of presence

The presence of egg/milk allergens need not be declared on the label if the wine has tested negative for the presence of these residual allergens using a technique with a detection limit of 0.25 mg/L.

### 3 Wording

As you know, the allergens statement must be preceded by "Contains". The "Contains" need not be repeated for each allergen. For example, "Contains sulphites, egg and milk" will be sufficient. Acceptable wordings for egg and milk are:

- (a) Egg: "egg", "egg protein", "egg product", "egg lysozyme" or "ovo-albumin".
- (b) Milk: "milk", "milk product", "milk casein" or "milk protein".

#### 4 Languages

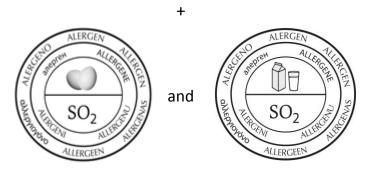
The European Union has not yet published a list of the languages required for the egg/milk statement in each of the 27 member states. Neither are official translations of the acceptable wordings in the various languages available. All we have at this stage is the list of acceptable languages (and translations) for the sulphites statement. It cannot be assumed that these same languages will apply to egg/milk as the similarity between translations of "sulphites" does not necessarily apply to translations of "egg" or "milk". We do, however, attach an Australian list (based on the languages for the sulphites statement) supplying translations for "egg" and

"milk". Please note that this is not an official or authoritative list, but it may be of help to you.

### 5 Pictograms

We do believe the European Commission has proposed to the EU member states that the allergens statement will be sufficient if shown only in English, but in conjunction with the relevant pictogram(s). For example:

Contains sulphites, egg and milk



Whether this will be accepted by the EU member states or have any practical value is an open question. It is also not clear whether the eggs and milk pictures and the sulphites symbol can all three appear within one pictogram.

We realise that above-mentioned leaves uncertainties and risks, but it reflects our best knowledge at this stage. Updates will be provided as soon as information comes to light.

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WINE OF ORIGIN (WO) · INTEGRATED PRODUCTION OF WINE (IPW) · ESTATE BRANDY

Member State	Authorised Languages		Trans	slations	
		Contains	Sulphites	Eggs	Milk
Austria	German				
Belgium	English, German, French or Dutch				
Bulgaria	Bulgarian	съдържа	серен диоксид	яйце	мляко
Cyprus	Greek	Περιέχει	Θειώδη	αυγά	γάλα
Czech Republic	Czech	Obsahuje	Siřičitany	vejce	mléko
Denmark	Danish or Swedish	Indeholder	sulfitter	Æg	Mælk
Estonia	Any EU language	Sisaldab	sulfitid	muna	piim
Finland	Finnish and Swedish (Swedish can be replaced by Danish or Norwegian)	Sisältää	sulfiitteja	munat	maito
France	French or English	Contient	sulfites	oeuf	lait
Germany	German	Enthält	Sulfite	Eier	Milch
Greece	Greek	Περιέχει	Θειώδη	αυγά	γάλα
Hungary	Hungarian	Tartalmaz	Szulfitok	tojás	tej
Ireland	English or U.S English	Contains	sulphites	eggs	milk
Italy	Italian	Contiene	solfiti	uova	latte
Latvia	Latvian	Satur	sulfītus	Olas	Piena
Lithuania	Lithuanian	Sudėtyje yra	Sulfitai	kiaušinių	pieno
Luxembourg	French or German				
Malta	Maltese or English or Italian	Fih	sulfiti	tal-bajd	tal-ħalib
Poland	Polish, English, French or Spanish	Zawiera	Siarczyny	jaj	mleka
Portugal	Portuguese or English, French or Spanish	Contém	sulfitos	ovo	leite
Romania	Romanian	conţine	bioxid de sulf	ou	lapte
Slovakia	Slovakian	Obsahuje	Siřičitany	vejce	mléko
Slovenia	Slovenian	Vsebuje	sulfit	jajca	mleko
Spain	Spanish or English, French, Italian or Portuguese	Contiene	sulfitos	huevo	leche
Sweden	Swedish or English	Innehåller	Sulfiter	ägg	mjölk
The Netherlands	Dutch	Bevat	Sulfieten	eieren	melk
UK	English, US English	Contains	sulphites	eggs	milk