



NEW ZEALAND WINE
PURE DISCOVERY

NEW ZEALAND WINEGROWERS' SUBMISSION TO FOOD STANDARDS AUSTRALIA AND NEW ZEALAND

PROPOSAL P1035 - GLUTEN CLAIMS ABOUT FOODS CONTAINING ALCOHOL

22 DECEMBER 2014

A INTRODUCTION

New Zealand Winegrowers (NZW) is the organisation that provides strategic leadership for, and researches, promotes and represents the interests of, New Zealand grape growers and wine makers. Established in 2002 as a joint venture between the New Zealand Grape Growers Council and Wine Institute of New Zealand, NZW has approximately 700 winery and over 800 independent grape grower members. Every grape grower and wine maker in New Zealand is a member of NZW. Accordingly, NZW is recognised as New Zealand's principal wine industry organisation.

The wine sector is a major contributor to the New Zealand economy. New Zealand is currently exporting over NZ \$1.3 billion of wine annually and NZW predicts exports will reach NZ \$2 billion by 2020.

The regulatory environment in which New Zealand's wine is produced and sold is vital to and underpins the ongoing success of the wine industry. Therefore New Zealand Winegrowers welcomes the opportunity to provide comments on Proposal 1035 on gluten claims about food containing alcohol.

B COMMENTS ON THE PROPOSAL

NZW supports the proposal to enable products containing more than 1.15% alcohol by volume to continue to make gluten free claims when Standard 1.2.7 Nutrition Health and Related Claims becomes mandatory from January 2016.

We recognise the benefits to sufferers of Celiac's disease in having product specific information to identify gluten free products.

We support our members having the ability to make these claims, should they wish to do so, alongside other alcohol products.

No ingredients used in the production of wine contain gluten and therefore we do not believe that making such claims would be misleading or in breach of New Zealand's consumer legislation.

There have been reports of some wines containing traces of gluten from the use of flour based glues in oak barrels. Enabling these claims to be made would provide certainty to consumers who have concerns about the possible transfer of gluten to wine during the production process.

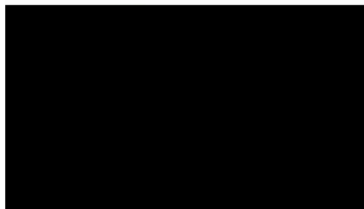
Under the current proposal, where nutrition information is provided that a wine is gluten-free, a nutrition information panel (NIP) would be required. Alcohol products are currently exempt from requiring a NIP under standard 1.2.8 along with a wide range of other foods. Requiring NIP's will result in costs to industry from testing and labelling changes. NZW supports the addition of an exemption for alcohol products when providing nutritional information on gluten, as provided for in the current exemption in standard 1.2.8.

C CONCLUSION

NZW is supportive of Proposal 1035 that gluten free claims for food containing more than 1.15% alcohol by volume will continue to be permitted after January 2016.

Please contact us if we can provide any further assistance or information.

Yours faithfully



Philip Gregan
Chief Executive Officer
New Zealand Winegrowers

