



BREWERS
ASSOCIATION

Brewers Association of Australia & New Zealand Inc

**Brewers Association of Australia and New Zealand
Submission to
Food Standards Australia New Zealand**

Submission - Proposal P1035

Gluten Claims about Foods containing Alcohol

24th December, 2014

Summary

The Brewers Association of Australia and New Zealand (Brewers Association) welcomes the opportunity to provide comment on Proposal P1035.

Australian members of the Brewers Association comprise Carlton & United Breweries, Coopers and Lion Co that produce and distribute around 95% of domestically brewed beer. New Zealand members comprise DB Breweries and Lion Co who are similarly the major brewers in the New Zealand market.

The Brewers Association believes this Proposal addresses the oversight that arose in the development of Standard 1.2.7 which will prohibit effective from January 2016 nutrition claims (excepting energy and carbohydrate) for foods containing more than 1.15% alcohol. This prohibition, once in force, will prevent provision of useful information to consumers, particularly those who are affected by Coeliac Disease and who wish to have greater choice in alcohol beverages.

The Brewers Association therefore both welcomes and supports the Proposal.

Discussion

The Australian and New Zealand members of the Association are aware of the incidence of Coeliac Disease and its impact on those in the community who are affected. Consequently we have on a number of occasions, met and discussed the issue with both Coeliac Society of Australia (now Coeliac Australia) and with Food Standards Australia and New Zealand.

The meetings with Coeliac Australia indicated that traditional beers were not suitable for those with Coeliac Disease and that there was high awareness of this fact. The Brewers Association accepted and publicised this by the development of an information sheet which was published a number of times in the Society magazine and is on the Brewers Association website.

As a consequence, FSANZ did not require labelling for the presence of gluten on beer packages. Conversely none of the major brewers developed low or gluten free products and made such claims.

More recently however the growth of “craft brewing” and the ready availability of small brewing plants has provided the opportunity for the development and introduction of many new products including “gluten free” beers. Such products often require the introduction of new raw materials and the development of alternative brewing techniques.

The Brewers Association has welcomed the increased interest in beer styles, believing that it provides greater choice to the consumer. We see the introduction of low gluten and gluten free beers as providing potential products of interest to those with Coeliac Disease. We are therefore concerned with the prohibition in Standard 1.2.7 pertaining to claims regarding gluten for alcohol beverages after January 2016.

Proposal P1035 recognises the reality of the marketplace and addresses this concern. Gluten free beers are already on the market including some developed “under the guidance of the WA and Australian Coeliac Societies”.¹ That such products were developed with input from coeliac societies and indeed are referenced on the Coeliac Society website indicates that they meet a need for those with Coeliac Disease.

The Brewers Association therefore believes that the Standard 1.2.7 prohibition will not only adversely affect the development and introduction of such products but more importantly limit access to information relevant to consumers. It therefore supports Proposal P1035, believing that the ability to make claims regarding gluten will be beneficial, particularly for those with Coeliac Disease.

¹ <http://billabongbrewing.com.au/product-category/beer/gluten-free/>