



Food Allergy Risk Table for EC, ANZ, USA and Japan

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BREWERS CLAREX®

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In the table the presence of a Food Allergen is given in relation to the labeling requirements in the different regions:

- EC = European Community: EC Directive 2007/68/EC amending Directive 2000/13/EC as regards indication of the ingredients present in foodstuffs, in particular allergens, and Annex III a.
- ANZ = Australia and New Zealand: Standard 1.2.3, Mandatory Warning and Advisory Statements and Declarations, Table to clause 4 (Kamut⁶ is not included).
- USA: The Top 8 of the USA Food Allergen Labeling and Consumer Protection Act 2004 are in **Bold**.
- Japan: Specifications and Standards for food, food additives, etc under Food Sanitation Law (abstracts) 2006, updated March 2007, mandatory labeling is required for very small quantities, even in case of carry-over or processing aids and recommended for 20 substances known as allergen.

Explanation of indicators used in the table for each region:

Yes = Present and labeling is required or see remark,

No = not present, no labeling is required.

Allergens	EC	ANZ	USA ¹	Japan
Buckwheat and products thereof	NO	NO	NO	NO
Celery and products thereof	NO	NO	NO	NO
Cereals containing gluten and products thereof (i.e. Barley, Kamut ⁶ , Oats, Rye, Spelt, or their hybridized strains)	NO	NO	NO	NO
Wheat and products thereof	NO ⁴	YES ³	NO ⁵	YES ³
Egg and products thereof (lysozyme)	NO	NO	NO	NO
Fish and products thereof	NO	NO	NO	NO
Crustacean shell-fish and products thereof	NO	NO	NO	NO
Lupine and products thereof	NO	NO	NO	NO
Mollusc and products thereof	NO	NO	NO	NO
Milk (including Lactose) and products thereof	NO	NO	NO	NO
Mustard	NO	NO	NO	NO
(Tree) Nuts (i.e. Nut oil, Almonds (<i>Amygdalus communis</i> L.), Brazil nut (<i>Bertholletia excelsa</i>), Cashew (<i>Anacardium occidentale</i>) Hazelnut (<i>Corylus avellana</i>), Macadamia nut and Queensland nut (<i>Macadamia ternifolia</i>), Pecan nut (<i>Carya illinoensis</i>), Pistachio nut (<i>Pistacia vera</i>), Walnut (<i>Jugland regia</i>))	NO	NO	NO	NO
Peanuts	NO	NO	NO	NO
Sesame seed	NO	NO	NO	NO
Soy (beans) and products thereof	NO	NO	NO	NO
Sulphur dioxide and sulphite at concentrations of more than 10 mg/kg or mg/liter expressed as SO ₂	NO	NO	NO	NO

Fruits: Oranges, Kiwi, Peaches, Apples, Bananas	NO	NO	NO	NO
Mushrooms	NO	NO	NO	NO
Yams	NO	NO	NO	NO
Gelatine	NO	NO	NO	NO
Meat, Beef, Pork, Chicken	NO	NO	NO	NO

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Relevant references are given in the footnotes.

Remarks:

1. According FDA's Compliance Policy Guide published in Federal Register on May 3, 2001, according section 403 of the Federal Food, Drugs and Cosmetic Act (21 U.S.C. 342), processing aids are not exempted from labelling obligation, when containing allergens (21 CFR101.4) or a protein derived from the allergen mentioned.
2. Dextrose and Maltodextrins derived from wheat used in formulation are excluded in Directive 2007/68/EC.
3. Derived raw materials, considered to be consumed during fermentation
4. Ingredients used in fermentation of an enzyme do not fall within the scope of EC Directive 2003/89 as was confirmed by the European Commission in a letter to AMFEP (Association of Manufacturers and Formulators of Enzyme Products) dated June 22, 2004.
5. The Enzyme Technical Association has taken the position that microbially derived enzymes do not fall within the scope of the Food Allergen Labeling and Consumer Protection Act (FALCPA) and that labeling for food allergens is not triggered by the use of a microbially derived enzyme. Thus a component(s) of fermentation media derived from an allergen as defined by the Act, when used to produce the enzyme, does not trigger allergen labeling under FALCPA.
6. Kamut is not included in the (ANZ) Standard 1.2.3 , Mandatory Warning and Advisory Statements and Declarations, Table to clause 4
7. Fish gelatine or Isinglass as finishing agent in beer and wine are excluded in Directive 2007/68/EC.
8. Fully refined soybean oil and fat are excluded in Directive 2007/68/EC.

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