

European and Canadian Allergen Labeling on Alcohol

Both Canada and Europe require allergens to be labeled under the law. The European model may be one to look at when considering alcohol labels and packaging. They have had this law in existence for more than 10 years and are very specific about type of product, what allergens to label, and how to label for them. Some notes and examples below.

European Union

The EU requires allergen labeling of alcoholic beverages. Our own, [USDA outlines the exact specifications](#) of how to label to comply with EU policy.

Mandatory labelling of the top 14 most common allergens applies to alcoholic beverages ([European Parliament document, page 2](#)). These Top 14 allergens (and derivatives thereof) are same as those required to be labeled in food products:

- cereals containing gluten
- milk
- eggs
- nuts
- peanuts
- soybeans
- fish
- crustaceans
- molluscs
- celery
- lupin
- sesame
- mustard
- sulphites

[Under the French regulation](#) on alcoholic beverage packaging, the type of drink, alcohol content, as well as the list of allergenic substances must appear on the packaging.

[By December 2023, all labels on wine sold in the EU are required to have nutritional information.](#)

The regulation comes with a few stipulations:

1. Ingredients causing allergies and intolerance are required to be on the physical label.
2. The electronic labels may only contain the required information — no content for sales or marketing purposes is allowed.
3. These electronic labels cannot collect or track user data.

In Ireland, the guidance for labeling wine involves the presence of the allergen in the final product:

Wines made completely or partially from grapes harvested in 2012 or later and labelled after 30 June 2012 must comply with the allergen requirements set out in Regulation (EU) No. 1169/2011 and Regulation (EC) No. 607/2009 as amended by Regulation (EU) No. 579/2012. However, note that Regulation (EU) No. 579/2012 states that in the case of egg/egg products or milk/milk products ingredients the indication is only mandatory if their presence can be detected in the final product using the analysis methods referred to in Articles 80(5) and 91(c) of Regulation (EU) No. 1308/2013.

Canada

In Canada, [alcoholic beverages must declare the presence of food allergens](#), gluten, and added sulfites if they are present at a level of 10 parts per million (ppm) or more:

Standardized alcoholic beverages

These include whisky, rum, gin, brandy, liqueurs, vodka, tequila, mezcal, wine, ice wine, cider, and beer. They are exempt from listing ingredients on the label, **unless they contain allergens, gluten, or added sulfites.**

Unstandardized alcoholic beverages

These include cocktails, cream liqueurs, ouzo, and sake. They must display a list of ingredients and clearly identify the presence of allergens, gluten, or added sulfites.

Gluten can be declared in one of two ways on the label:

- If an ingredient list is provided, gluten can be declared within the list.
- If no ingredient list is provided, gluten can be declared within a “Contains” statement.

For more information on allergen declaration on product labeling, you can consult the Canadian Food Inspection Agency.

[Canada has a guide](#) regarding small surface area <100cm² package labeling. However, it does not mention allergens in those guidelines. Often, the requirement to include a full ingredient or nutrition list is exempted on packaging for small surface areas (but not on the larger packaging/container that it is sold in), **but allergens are typically still required in a modified format (for example, in a “contains” statement).**