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Writer's Direct Access
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December 21, 2018

Via Electronic Mail and Mail

Mr. Paolo Velo
NICO VELO S.p.A.
Via Roma 46
35014 Fontaniva PD
ITALY

**Re: FDA Status of Concrete Vessels Used to Ferment, Age, and Hold Wine;
Our File No. NI17143-01**

Dear Mr. Velo:

The purpose of this letter is to respond to your request for our opinion regarding the status, under the laws and regulations administered by the U.S. Food and Drug Administration (FDA), of NICO VELO S.p.A.'s (Nico Velo) concrete vessels when intended for use in fermenting, aging, and holding bulk quantities of wine. We understand the concrete wine vessels ("tanks") are formed by mixing sand, water, aggregate (crushed rock), and Portland cement, as well as air that is incorporated into the mixture. You indicated that after curing they are treated with tartaric acid prior to the initial contact with wine. Further, you informed us that the wine tanks are large, with a minimum holding capacity of 1000 liters.

Based on the information you provided, including the results of analyses of potential extractables from samples of the tanks, it is our opinion that the intended use of Nico Velo's concrete vessels for fermenting, aging, and holding wine may properly be considered to comply with the Federal Food, Drug and Cosmetic Act and applicable FDA regulations, including the suitable purity requirement in 21 C. F. F. § 174.5 ("General provisions applicable to indirect food additives").

KELLER AND HECKMAN LLP

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We trust that you will find this letter fully responsive to your request for our opinion. If you should have any further questions regarding this matter, or if we may be of assistance in any other way, please do not hesitate to contact us.

Cordially yours,



Cynthia B. Lieberman