

10 August 2016

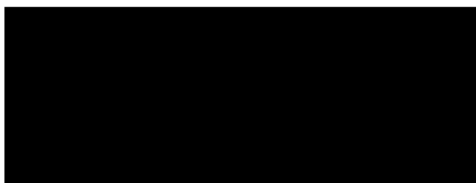
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for submissions – Application A1119: Addition of Water to Facilitate Wine Fermentation.***

Yours sincerely



Katherine Rich
Chief Executive



***Call for submissions – Application A1119:
Addition of Water to Facilitate Wine
Fermentation***

**Submission by the New Zealand Food & Grocery
Council**

10 August 2016

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the ***Call for submissions – Application A1119: Addition of Water to Facilitate Wine Fermentation.***
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

OVERARCHING COMMENTS

3. NZFGC has not commented on those elements of this application that would result in amendment to Standard 4.5.1 as this is an Australia-only standard with no application in New Zealand. However, the proposals also impact the definitions in Standard 1.1.2 and a note in Standard 2.7.4. Both these Standards have applicability in New Zealand.
4. The application has arisen from issues with winemaking that the Australian wine industry has termed “stuck” fermentations. These are fermentations that require various interventions in the winery to resolve. One such intervention is to dilute high sugar musts (grape juice before yeast is added to initiate fermentation) by adding water to assist the fermentation process.
5. The suggestion is that the occurrence of “stuck” fermentations is increasing due to shorter, warmer vintage (grape harvest) periods and resultant harvested grapes with higher than optimal sugar contents.
6. Climate change effects will impact wine production and winemaking worldwide and the New Zealand industry can expect similar impacts as those described for the Australian wine industry. Any amendments proposed to address these impacts for Australia will therefore have relevance to New Zealand.
7. “Wine” is defined in Standard 1.1.2 with a cross reference to section 1.1.2—3 provided in the Note in section 2.7.4—2. Section 2.7.4—3 requires that food sold as wine must be wine as defined in Standard 1.1.2. Any changes to the wine definition in Standard 1.1.2 requires a consequential amendment to the Note in Standard 2.7.4.
8. NZFGC supports the proposed amendment to the definition of “wine” so that incorporates the addition of water to facilitate fermentation, the consequential amendment to Standard 2.7.4 and an additional amendment to Schedule 2 *Units of measurement* to include a new tram for concentration, units of Baumé (Bé) which is favoured by Australian winemakers (rather than degrees Brix used by US winemakers).

SPECIFIC COMMENTS

The Application

9. This application has arisen from issues with winemaking that the Australian wine industry has termed “stuck” fermentations. These are fermentations that do not proceed smoothly to completion, but require various interventions in the winery to resolve. The suggestion is that the occurrence of “stuck” fermentations is increasing due to shorter, warmer vintage (grape harvest) periods and resultant harvested grapes with higher than optimal sugar contents. The solution proposed is to dilute high sugar musts (grape juice before yeast is added to initiate fermentation) by adding water. No provisions exist in the Code that allows for this remedy.
10. Wine regulations in the USA allow water addition to “facilitate fermentation” while in the EU regulations water is prohibited during wine production “except where required on account of a specific technical necessity”.
11. This application is primarily about wine production and relevant to Chapter 4 in the Australia New Zealand Food Standards Code (the Food Standards Code) on *Primary production standards* which is an ‘Australia only’ chapter of the Food Standards Code. Specifically the proposals apply to Standard 4.5.1 *Wine production requirements*. However, if progressed, amendment will also be required to Standards 1.1.2 *Definitions used throughout the Code* 2.7.4 *Wine and wine product* that appear in Chapters 1 and 2, *Introduction and standards that apply to all foods* and *Food standards* respectively. Both Chapters 1 and 2 and the standards within them generally apply to both Australia and New Zealand and it is in these areas that NZFGC has an interest.

Use of water in winemaking

12. The Application argues that with the increasing impact of climate change there is a greater chance of “stuck” fermentations due to higher sugar content musts. The reasons for harvested grapes having higher sugar content are higher average temperatures during grape development and during the vintage period. Australian wineries are also noticing an earlier start to vintage and a shorter vintage period which may cause grapes to be picked later than optimal, due to equipment and logistical (transportation and winery capacity) limitations. The suggestion is that the growing season is expected to get warmer and vintage period is likely to get shorter and hotter due to climate change.
13. According to Mozell and Thach (2014) premium winegrape production occurs within very narrow climate ranges and winegrape growing is at greater risk from both short-term climate variability and long-term climate changes than other crops. While this work is on winegrape production rather than winemaking, it supports the case that climate change is affecting the wine industry.
14. FSANZ has accepted the arguments and justification provided in the Application and notes the proposed provision to use water to dilute high sugar musts to limit “stuck” fermentations is similar to that in the USA regulations.

Risk Management

15. There is no safety issue involved in this application. Rather allowing for the use of water to dilute high sugar grape must to facilitate fermentation is considered a technical requirement of wine production.

Impact on New Zealand winemaking

16. To the extent that climate change effects will impact wine production and winemaking worldwide, the New Zealand industry can expect similar impacts as those likely to impact

the Australian wine industry. Any amendments proposed to address these impacts for Australia will therefore have relevance to New Zealand.

The permission

17. "Wine" is defined in Standard 1.1.2 with a cross reference to section 1.1.2—3 provided in the Note in section 2.7.4—2.
18. Section 2.7.4—3 requires that food sold as wine must be wine as defined in Standard 1.1.2. Any changes to the wine definition in Standard 1.1.2 will require a consequential amendment to the Note in Standard 2.7.4.
19. "Wine" is currently defined as "... (b) such a food with any of the following added during production:
 - (i) grape juice and grape juice products
 - (ii) sugars
 - (iii) brandy or other spirit
 - (iv) water that is necessary to incorporate any substance or food permitted for use as a food additive or a processing aid."
20. In future, it is proposed this read:

"... (b) such a food with any of the following added during production:
 - (i) grape juice and grape juice products
 - (ii) sugars
 - (iii) brandy or other spirit
 - (iv) water that;
 - (A) is necessary to incorporate any substance or food permitted for use as a food additive or a processing aid; or
 - (B) facilitates fermentation; or
 - (C) is incidental to the winemaking process."
21. NZFGC supports this change in definition and the consequential change that will be necessary to a note in Standard 2.5.4, section 2.7.4—2.
22. Sugar concentration is discussed in terms of the competing use of units of Baumé (Bé) used by Australian winemakers, rather than degrees Brix used by US winemakers. One degree Bé is equivalent to 1.8 degrees Brix. The only implication of this for New Zealand is the inclusion in Schedule 2 *Units of measurement*.
23. NZFGC has no issues with the inclusion of Baumé (Bé) in Schedule 2 of the Food Standards Code.

Reference

Mozell MR, Thach L. (2014) The impact of climate change on the global wine industry: Challenges & solutions. *Wine economics and policy*, 3:2 Dec 2014, 81-89
doi:10.1016/j.wep.2014.08.001