



## Wine Grape Council SA

Food Standards Australia New Zealand  
PO Box 5423  
KINGSTON ACT 2604

To Whom It May Concern

### **Addition of Water to Facilitate Wine Fermentation**

On behalf of Wine Grape Council South Australia (WGCSA) I am writing to comment on the proposal from the Winemakers Federation of Australia to amend Standards to permit the addition of water to must to aid fermentation.

Our organisation represents approximately 3,200 South Australian independent winegrape producers, i.e. they primarily grow winegrapes for sale and supply to wine processors rather than make wine themselves.

WGCSA has a number of concerns about this proposal. We acknowledge that stuck ferments are an issue and that the addition of water is an important amelioration tool. While WGCSA accepts that higher sugar levels can be the result of shorter, warmer vintages but notes that this is not the complete picture: in our view reduction and consolidation of processing capacity and a reluctance to spread harvest (i.e. blend fruit harvested at a range of ripeness) are also factors in fruit being taken in at higher than optimum Be levels.

WGCSA is concerned to ensure that any changes to the Standard don't result in a reasonable remedial strategy transferring over time to a practice norm, i.e. processing grapes at higher Be and adjusting with water rather than working to receive and process fruit at its optimum ripeness. There are also important economic implications for producers as winegrapes are typically sold by weight. Berry weight declines after optimum ripeness; as alcohol increases and berry weight fall so too does return for the producer. The risk of disease, e.g. from rain or excessive heat also increases.

Without being in a position to comment on the specifics of restricting the addition of water to must below 15Be, WGCSA supports the proposal in principle of limiting the addition of water to the exception rather than the rule

Kind regards



Peter Hackworth  
Executive Officer

10 August 2016