



NEW ZEALAND WINE

P U R E D I S C O V E R Y

**SUBMISSION TO
FOOD STANDARDS AUSTRALIA NEW ZEALAND**

**A1119
Addition of Water to Facilitate Wine Fermentation**

10 August 2016

Introduction to New Zealand Winegrowers

New Zealand Winegrowers provides strategic leadership for the wine industry and is the peak body that represents the interests of all of New Zealand's grape growers and wine makers. New Zealand Winegrowers grew out of longstanding cooperation and collaboration between the New Zealand Grape Growers Council and the Wine Institute of New Zealand, and began operation as a combined entity in 2002. In 2016 the separate entities merged to become a single unified industry body: New Zealand Winegrowers Inc. New Zealand Winegrowers represents all of New Zealand's 700 winery and over 800 independent grape grower members.

New Zealand Winegrowers appreciates the opportunity to comment on FSANZ' *Call for submissions Application A1119 Addition of Water to Facilitate Wine Fermentation*, in which the Winemakers Federation of Australia seeks an amendment to the ANZ Food Standards Code (**Code**) to permit the addition of water to facilitate the fermentation of high sugar grape musts.

Not for New Zealand wine please

New Zealand Winegrowers does not oppose the application to the extent it relates to wine made in Australia.

We do, however, oppose the making of any amendment to the Code to expressly permit the addition of water to "facilitate fermentation" in respect of wine made in New Zealand.

Unlike Australia, a distinctive feature of New Zealand wine is that it is produced as a cool-climate wine. Although there may occasionally be instances where New Zealand grapes are harvested at such a high brix level that they cannot be fermented to dryness, that is generally seen as a choice made by the grower/winemaker that is to be factored into the harvesting decision. New Zealand growers and wineries make substantial ongoing investments in infrastructure to ensure that they retain optimum flexibility around grape harvesting and processing.

Against this background of a lack of industry demand for a change in New Zealand, there is a real risk that changing the Code to permit the addition of this water in New Zealand could be seen internationally as sanctioning a questionable winemaking practice. This could potentially be damaging to the reputation of New Zealand wines and so represents a potentially material cost to be factored into the cost benefit analysis. For this reason, New Zealand Winegrowers **does not support** the application to permit the addition of water "to facilitate fermentation" in respect of New Zealand grape wine.

If the application is accepted in respect of wines made in Australia, we make the following points.

Application lacks clarity

Although the application talks about the need to add water to high sugar grape must to "aid fermentation", that term is not particularly clear and is, arguably, subjective. The underlying purpose appears to be not so much to *facilitate the process of fermentation* (given that yeast fermentation will

naturally be expected to come to an end once the alcohol concentration reaches a certain level) as to *change the outcome of fermentation* ie to dilute the must to reduce the initial sugar and potential alcohol, and thereby allow the wine to ferment to dryness as opposed to fermentation stopping with residual sugar once the alcohol reaches somewhere around 18%.

We note that proposed Standard 2.7.4-2(iv)(B) ("*water that... ...facilitates fermentation*") does not refer to dilution of high sugar grape must. If the rationale for addition of (B) is to dilute high sugar musts, should this not also be stated within the definitional clause?

Significant volume increases contemplated

The application states (pg 2) that if the application is approved "*the costs of production will decrease and wine quality will improve*". The first clause of that phrase seems self-evidently true; the second clause is left unsubstantiated.

We note that the application seeks permission for quite significant water additions to Australian musts that have high sugar levels. The application notes (pg 3) that "*grapes can increase in ripeness from, say, 15 Bé, to 17 or as much as 20 Bé*", and seeks permission to add sufficient water to dilute the must to 15 Bé. In order to dilute 1 litre of grape must at 20 Bé to 15 Bé, 333 ml of water would need to be added in other words, the volume of the grape must would be increased by one third. We can understand how that would result in a decrease of production costs, and a possible increase in orders from Cana, Galilee.

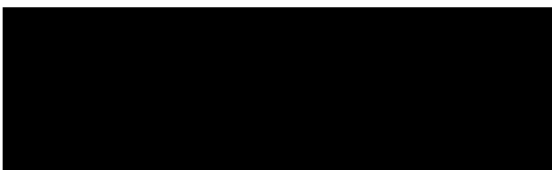
Conclusion

New Zealand Winegrowers:

- (a) opposes any amendment of the Code to permit the addition of water to dilute high sugar grape musts in the production of New Zealand grape wine;
- (b) does not oppose the amendments sought in respect of Australian grape wine; and
- (c) if the application is accepted in respect of Australian wine, we query whether an express reference to the presence of high sugar levels should also be inserted in 2.7.4-2(iv)(B).

If, despite this submission, the FSANZ is minded to make the amendment in respect of addition of water to aid fermentation of New Zealand grape wine, we request the opportunity to make further submissions in person.

Yours faithfully



Jeffrey Clarke
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New Zealand Winegrowers