

## Application to amend Standard 4.5.1 of the Australian New Zealand Food Standards Code

### Executive summary

The Winemakers' Federation of Australia (WFA) is the national peak body for Australia's winemakers. WFA has made this application is made to vary an existing Standard in the *Australia New Zealand Food Standards Code* (the Code); Standard 4.5.1 – Wine Production Requirements and Standard 2.7.4 Wine and Wine Product to permit the addition of water to facilitate fermentation.

This Application is supported by the Australian Grape and Wine Authority (AGWA).

We believe it is necessary to apply for a change to the Code to clarify the intent of the permission and explicitly enable the addition of water to dilute high sugar must to aid fermentation. This will ensure Australian wine producers be provided access to techniques enabling the production of the best wine possible from the grapes at their disposal.

Prior to 2009 water addition was limited to 3% and WFA submitted an application to the Code as this level was considered insufficient to cover all necessary incidental water incorporation given typical additive requirements and unavoidable winemaking practices such as pushing through transfer lines with water. This permission to add water arguably does not, however, extend to the deliberate addition in order to lower the sugar concentration of incoming musts.

The issue that has now arisen is that with warm vintages, grapes with optimal flavour characteristics are increasingly likely to display historically high sugar content at harvest. This results not only from the trend towards higher average temperatures during the growing season, but also from earlier, more compressed harvests presenting dilemmas for scheduling of grape intake, and winery processing capacity. These ripe grapes are then subject to potential fermentation problems, with a consequential negative effect on wine quality. In recent vintages, both anecdotal information and evidence provided by the Australian Wine Research Institute suggests that there is widespread use of addition of grape derived water (low-sugar juice) to must as an aid to fermentation. However, low sugar juice is not available to small producers and provides added cost. Water is commonly used in other producing countries to reduce the sugar concentration prior to fermentation

Other wine producing countries face the same climatic challenges as we do. When we deny Australians access to techniques available to producers in other countries we place ourselves at a competitive disadvantage. Continuing to tolerate this lack of a level playing field is difficult to defend when the ability to add judicious quantities of water:

- Has no adverse effects on human health, (in fact, may even provide health benefits)
- Involves no consumer deception,
- Maintains wine authenticity by ensuring the product's characteristic features arise from the harvested grapes,
- Takes into account particular climatic and other production conditions,
- Is based on the reasonable practical need to enhance the organoleptic qualities and consumer acceptance of the wine and
- Ensures the addition is limited to the minimum necessary to achieve the desired objective.

The application needs to cover the Australian-only Standard 4.5.1 **and** Standard 2.7.4 to ensure equal treatment to domestic producers and imported wine.