

Comments from the Victorian Departments of Health and Human Services, and Economic Development, Jobs, Transport and Resources.

Due date of submission: 7 June 2017

The Victorian Departments of Health and Human Services and Economic Development, Jobs, Transport and Resources (the departments) welcome the opportunity to provide comments on Application A1127 Processing aids for wine.

From the Food Standards Australia New Zealand (FSANZ) assessment report it is understood that:

- The Winemakers Federation of Australia (WFA) is seeking amendments to the Food Standards Code to permit the use of four processing aids in the production of wine sold in Australia: chitin-glucan, PVI/PVP co-polymers, ammonium bisulphite and silver chloride.
- The WFA has submitted this application in response to a request from the European Union to harmonise the permissions in the Food Standards Code with the *Agreement between Australia and the European Community on Trade in Wine* (Wine Agreement) which permits use of these processing aids in wine. The intent of the application is to ensure equal treatment between trading partners.
- The European Union has specific permissions for the use of each of the four processing aids in wine production. In addition, the USA has permissions for chitin-glucan, PVI/PVP co-polymers and ammonium bisulphite, and South Africa permits use of ammonium bisulphite in wine production.
- FSANZ has determined that there is sufficient evidence that the four processing aids are technologically justified and are effective in achieving their stated purpose.
- Chitin-glucan and PVI/PVP co-polymers are added to wine and wine must during production for decolouration, clarifying, filtration and absorbent purposes. These processing aids are removed from the final product before bottling and do not perform a technological purpose in the final food.
- Ammonium bisulphite is used in wine production as a microbial nutrient to aid fermentation. Breakdown of ammonium bisulphate by fermentation yeasts can result in sulphur dioxide that will have an ongoing preservative function in the final product. Presence of sulphur dioxide in the final product will need to be labelled, consistent with Standard 1.2.3 of the Food Standards Code.
- Silver chloride is used in wine production to remove fermentation and storage-related odours. In the EU, silver chloride is added to wine linked to an inert carrier molecule and is removed from the final product through filtration.
- FSANZ has prepared amendments to Schedule 18-9(3) of the Food Standards Code to permit wine produced using chitin-glucan, PVI/PVP co-polymers, ammonium bisulphite and silver chloride to be sold in Australia.
- FSANZ has prepared amendments to clause 4 of Standard 4.5.1 of the Food Standards Code to permit chitin-glucan, PVI/PVP co-polymers, ammonium bisulphite and silver chloride to be used as processing aids in wine produced in Australia.

The departments note that FSANZ has undertaken risk assessments for all four processing aids and, based on these, has determined that there are no potential public health and safety concerns from their use in wine production. The departments note that the risk assessments undertaken by FSANZ are subsequent to a comprehensive risk assessment process undertaken by the Organisation International de la Vigne et du Vin (OIV) expert committees which informed inclusion of these processing aids in the Wine Agreement.

However, the departments have a number of concerns related to the presentation of the risk assessments in FSANZ's Supporting Document 1:

- FSANZ has not proposed an acceptable daily intake for any of the processing aids and has therefore proposed that the Food Standards Code be amended to permit each processing aid to be added at levels consistent with good manufacturing practice (GMP). This differs from the approach used in the European Union where prescriptive requirements apply to the use of these processing aids in wine production. The departments seek clarification from FSANZ about implications of setting levels for use for these processing aids at GMP rather than following the prescriptive approach used in the European Union, including setting maximum permitted amounts for use.
- The level and quality of evidence provided to support the safety of each processing aid differs significantly. This makes it difficult to determine how FSANZ has assessed and concluded that the processing aids are safe for use in wine production. Further clarification on this point is requested.
- In the dietary exposure assessment for each of the four processing aids, FSANZ concludes that residual levels of the processing aids and their degradation products are likely to be negligible (with the exception of the presence of sulphur dioxide when ammonium bisulphates are used). It is unclear whether FSANZ's overall risk assessments for each of the processing aids is based on the negligible expected dietary exposure or low hazard associated with possible exposure. Further clarification on this point is requested.

The departments note that the WFA has applied for amendments to the Food Standards Code to include chitin-glucan, PVI/PVP co-polymers, ammonium bisulphite and silver chloride in Schedule 18-9 and to include chitin-glucan, PVI/PVP co-polymers and ammonium bisulphite, but not silver chloride in clause 4 to Standard 4.5.1. The departments seek clarification of the rationale for inclusion of all four processing aids in the amendments to clause 4 of Standard 4.5.1, noting that the Australian wine industry has not expressed the intention of using silver chloride in wine production in Australia.

Based on the information provided in FSANZ's call for submissions and pending clarification from FSANZ on the issues raised above, the departments support progression of Application A1127.