



NEW ZEALAND WINE

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

SUBMISSION TO FOOD STANDARDS AUSTRALIA NEW ZEALAND

on the

CALL FOR SUBMISSIONS – APPLICATION A1161:

Potassium polyaspartate as a food additive in wine

23 October 2018

Introduction to New Zealand Winegrowers

New Zealand Winegrowers (**NZW**) provides strategic leadership for the New Zealand wine industry and is the body that represents the interests of all of the country's grape growers and winemakers. Established in 2002, NZW is funded by compulsory levies under the Commodity Levies Act and the Wine Act and has approximately 1,500 members. New Zealand is the only major wine producing country to have a single, unified industry body that represents both grape growers and winemakers.

NZW welcomes the opportunity to make a submission to Food Standards Australia New Zealand (**FSANZ**) on the application received to permit potassium polyaspartate as a food additive (stabiliser) in wine, sparkling wine and fortified wine (**wine**) at a maximum permitted level of 100 mg/L. We also appreciate the desire of FSANZ to consult with stakeholders to assist consideration of the draft food regulatory measure.

NZW's Position

1. NZW has no objection to the use of potassium polyaspartate as a food additive (stabiliser) in wine at a maximum permitted level of 100 mg/L, for the following reasons set out in the call for submissions:
 - a. based on the hazard and dietary exposure assessments completed by FSANZ, there are no public health or safety concerns from the use of potassium polyaspartate as a food additive in wine at the proposed levels;
 - b. based on the FSANZ food technology assessment, the use of potassium polyaspartate as a food additive in the quantity and form proposed is technologically justified:
 - i. in the amount and form proposed, it is more effective than other food additives in preventing the growth of potassium bitartrate crystals; and
 - ii. it is suitable for its proposed use in wine and stability studies show it is stable for up to 12 months in wine;
 - c. the change is not inconsistent with existing or imminent international standards nor is it likely to have a significant effect on international trade:
 - i. there is no Codex or equivalent international standard for potassium polyaspartate as a food additive in wine; and
 - ii. potassium polyaspartate at a maximum use level of 100 mg/L has been included on the list of priority substances for evaluation by JECFA; and
 - d. the European Union (**EU**) already permits the use of potassium polyaspartate at the same maximum permitted level requested, so its inclusion as a permitted food additive would enable Australia and New Zealand winemakers to use the substance in compliance with EU requirements and not competitively disadvantage our winemakers. The New Zealand wine sector is critically dependent on global trade in its product and has a strong interest in ensuring maximum consistency amongst global standards for winemaking.

Conclusion

Thank you again for the opportunity to submit on this application. We would be happy to discuss any of the points raised in this submission in more detail.