



NEW ZEALAND WINE
PURE DISCOVERY

NEW ZEALAND WINEGROWERS' SUBMISSION TO FOOD STANDARDS AUSTRALIA AND NEW ZEALAND

PROPOSAL P1034 – CHEMICAL MIGRATION FROM PACKAGING INTO FOOD

22 DECEMBER 2014

A INTRODUCTION

New Zealand Winegrowers (NZW) is the organisation that provides strategic leadership for, and researches, promotes and represents the interests of, New Zealand grape growers and wine makers. Established in 2002 as a joint venture between the New Zealand Grape Growers Council and Wine Institute of New Zealand, NZW has approximately 700 winery and over 800 independent grape grower members. Every grape grower and wine maker in New Zealand is a member of NZW. Accordingly, NZW is recognised as New Zealand's principal wine industry organisation.

The wine sector is a major contributor to the New Zealand economy. New Zealand is currently exporting over NZ \$1.3 billion of wine annually and NZW predicts exports will reach NZ \$2 billion by 2020.

The regulatory environment in which New Zealand's wine is produced and sold is vital to and underpins the ongoing success of the wine industry. Therefore New Zealand Winegrowers welcomes the opportunity to provide comments on Proposal 1034 on Chemical Migration from Packaging into Food.

B COMMENTS ON THE PROPOSAL

NZW supports the assessment of the public health and safety risks relating to chemical migration from packaging into food. The review is timely, particularly given heightened consumer concerns on assurance and product integrity both in New Zealand and in our overseas markets generally. While wine is a product that is low risk in this regard we support the investigation into these issues.

NZW supports the submission made by the Winemakers Federation of Australia on issues relating to chemical migration.

Plasticisers have incorrectly been the source of some trade and media issues for the wine industry, specifically disputed allegations of BPA and/or other plasticisers leaching from screwcap liners. We are also aware of issues in relation to testing for phthalates in the China market.

As an industry organisation, we are concerned that these two issues have led to misunderstandings about the relationship between migration limits for packaging materials and limits for the food

products themselves, particularly when there are conflicting views on the health issues associated with these two areas.

We are aware of the upcoming release by the European Food Safety Authority in January of its opinion on the risks to public health from BPA in foodstuffs, which will be of relevance to this review.

<http://www.efsa.europa.eu/en/press/news/141212.htm>

NZW would like to offer to contribute technical information and expertise to the review as it progresses.

Yours faithfully



Philip Gegan
Chief Executive Officer
New Zealand Winegrowers

