

27 February 2015

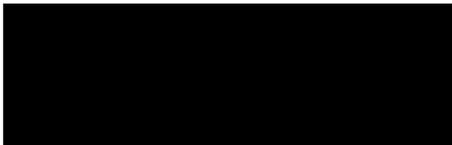
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for submissions – Application A1103: Citric and Lactic Acids in Beer and related products.***

Yours sincerely



Katherine Rich
Chief Executive

Food Standards Australia New Zealand
CALL FOR SUBMISSIONS – APPLICATION A101103: CITRIC AND LACTIC ACIDS IN BEER AND RELATED PRODUCTS

2 March 2015 (extended from 27 February 2015)

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to comment on the *Call for submissions – Application A1103: Citric and Lactic Acids in Beer and related products*.

New Zealand Food & Grocery Council

NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$28 billion in export revenue from exports to 185 countries – some 61% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 46% of total manufacturing income and 34% of all manufacturing salaries and wages. Our members directly or indirectly employ 370,000 people – one in five of the workforce.

The Application

The Application seeks to amend Standard 1.3.1 – Food Additives of the Australia New Zealand Food Standards Code (the Food Standards Code) to permit citric and lactic acids to be added as food additives (acidity regulators) to beer and related products at good manufacturing practice (GMP) levels.

Comments

NZFGC notes that the purpose of adding citric and lactic acids in beer production is to reduce the pH for lower strength and flavoured beers. Such acidity adjustment can improve the flavour profile of these types of beer.

NZFGC considers that enhancing the production of lower strength beers and encouraging innovation in the area of flavoured beers are both laudable activities that deliver benefits to consumers in terms of choice and sensible consumption. Permission for citric and lactic acids to be added to beer and related products would provide greater internal consistency within the Food Standards Code since both acids are permitted to be added to a range of other alcoholic beverages regulated under the Food Standards Code.

The FSANZ risk assessment notes that citric and lactic acids are both substances of very low toxicity and occur in many foods e.g. in lemon/orange juice (citric acid) and cheese/yoghurt (lactic acid). The conclusion was that adding citric and lactic acids to beer and related products was technologically justified and safe. Maximum levels were not proposed as there is no risk to health and safety from their use under GMP.

Citric and lactic acids are permitted to be added (at GMP) to beers and related food categories in the food regulations of other countries (USA, Canada and Europe), and in the Codex Alimentarius General Standard for Food Additives (GSFA). We also note that prior to the Food Standards Code coming into force in 2002, the New Zealand Food Regulations 1984 permitted both citric and lactic acids to be added to beer and related products.

NZFGC agrees that permission in the Code would not only provide consistency with international regulations and trading partners but restore a former permission for New Zealand manufacturers of beer and related products. NZFGC is therefore strongly supportive of the application and the consequent amendment to Standard 1.3.1 – Food Additives of the Food Standards Code to permit the addition of citric and lactic acid to beer and related products.