

Food Standards Australia New Zealand

Submission in response to Application A1119 Addition of water to facilitate fermentation



SOUTH AUSTRALIAN WINE INDUSTRY
ASSOCIATION INCORPORATED

SUBMISSION OF: SOUTH AUSTRALIAN WINE INDUSTRY
ASSOCIATION INCORPORATED

ABN: 43 807 200 928

ADDRESS: First Floor, Industry Offices
National Wine Centre
Botanic Road
ADELAIDE SA 5000

CONTACT PERSON: [REDACTED]

POSITION: Project Manager – Environment & Technical

TELEPHONE: [REDACTED]

FACSIMILE: [REDACTED]

EMAIL: [REDACTED]

WEB: www.winesa.asn.au

DATE: 10 August 2016

Submissions by 10 August 2016 to:
Food Standards Australia New Zealand
PO Box 5423
Kingston ACT 2604
Email: submissions@foodstandards.gov.au

South Australian Wine Industry Association Incorporated

ABN 43 807 200 928

1st Floor Industry Offices, National Wine Centre, Botanic Road, Adelaide SA 5000

Tel: 61 8 8222 9277 Fax: 61 8 8222 9276 Email: admin@winesa.asn.au Web: www.winesa.asn.au

INTRODUCTION

The South Australian Wine Industry Association (SAWIA) has prepared this submission to Food Standards Australia New Zealand on the proposal outlined for Application A1119 (Addition of water to facilitate wine fermentation) in response to its call for submission released on 29 June 2016.

This submission has been prepared following feedback SAWIA has received from its membership about the proposal.

SUBMISSION

In principle, SAWIA supports the proposal to amend the relevant water use provisions in Standard 1.1.2 and Standard 4.5.1 to facilitate fermentation, and offers the following comments.

Feedback from SAWIA members indicates a view that the proposed limit of dilution, *i.e.* 15 Baumé (Bé), may be too high to adequately prevent the avoidance of fermentation problems. Winemakers have suggested to SAWIA that a more appropriate limit might be around 13 Bé because this is the level at which fermentation problems generally begin to be observed. This is also broadly consistent with the situation under Federal laws in the United States of America as outlined in the proposal document (section 1.3.2).

An alternative was suggested by a number of members on the basis that they considered having a prescriptive limit might be inappropriate given the rapidly changing impacts of climate change. They suggested adopting a model similar to that in the European Union as outlined in the proposal document (section 1.3.4) that allows the addition of an unspecified amount of water “on account of a technical necessity”. We understand that a similar provision exists for the State of California. We believe that such a provision for Australia would provide a technically viable and enforceable solution.

SAWIA would be pleased to engage in further discussion with FSANZ in deciding the final wording of the proposal.

THE SOUTH AUSTRALIAN WINE INDUSTRY ASSOCIATION INCORPORATED

The South Australian Wine Industry Association Incorporated (SAWIA) is an industry employer association representing the interests of wine grape growers and wine producers throughout the state of South Australia.

SAWIA is a not for profit incorporated association, funded by voluntary member subscriptions, grants and fee for service activities, whose mission is to provide leadership and services which underpin the sustainability and competitiveness of our members' wine businesses.

SAWIA membership represents approximately 96% of the wine grapes crushed in South Australia and about 36% of the land under viticulture. Each major wine region within South Australia is represented on the board governing our activities.

SAWIA has a strong track record as an industry leader and innovator in many areas. SAWIA pro-actively represents members and the greater wine industry with government and related agencies in a wide variety of aspects of business in the wine sector.