



10 August 2016

Project Officer Application A1119
Food Standards Australia New Zealand
PO Box 10559
The Terrace
WELLINGTON 6036

Dear Sir/Madam

Application A1119 Addition of Water to Facilitate Wine Fermentation — Call for submissions

Thank you for the opportunity to comment on this application. The Ministry for Primary Industries (MPI) has the following comments to make.

While MPI does not oppose provisions to add water to facilitate fermentation for wine produced in Australia, we do not support this permission for wine produced in New Zealand. Due to cooler climate, New Zealand wine musts do not normally exceed 15 degrees Baumé (27 degrees Brix). Therefore, consideration should be given to making these provisions “*Australia only*”.

However, if these provisions were to apply in New Zealand, then MPI recommends that the provisions in full should apply in both New Zealand and Australia. In particular, it would be important that the regulatory limit on the amount of water that can be added, applies not only in Australia as currently proposed, but in both countries. The current wording is drafted in the “Australia only” Standard 4.5.1 clause (7B) as “*Water added to dilute high sugar grape must to facilitate fermentation must not dilute the must below 15 degrees Bé*”.

FSANZ has also proposed a change to the definition of wine to allow water that “*is incidental to the winemaking process*”. MPI questions whether this additional wording is in fact needed, noting that water may be used as a processing aid. Furthermore, why is it needed for wine when this could similarly be the case when processing many other foods including milk, fruit juices, beverages, or other liquid or semi-liquid foods? It is also unclear what “incidental” might, and how much water this may allow to be added. Although a limit of 70ml/L is specified in Standard 4.5.1 clause 5 (7) this only applies to Australian wine.

Yours sincerely,

Signed

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Manager Food Science and Risk Assessment