

25 October 2018

Project Manager
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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 A1161: Potassium polyaspartate as a food additive in wine.***

Yours sincerely



Call for submissions – Application A

Call for submissions – Application A1161: Potassium polyaspartate as a food additive in wine

Submission by the New Zealand Food & Grocery Council

25 October 2018

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the ***Call for submissions – A1161: Potassium polyaspartate as a food additive in wine.***
2. 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 \$31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

The Application

3. Enartis Pacific Pty Ltd, a company that is part of the Esseco Group based in Trecarte, Italy, applied for permission to add potassium polyaspartate as a food additive (stabiliser) to wine in Australia and New Zealand at a maximum permitted level of 100mg/L. Potassium polyaspartate acts as a stabiliser to prevent the growth of potassium bitartrate crystals. These crystals or “wine diamonds” sometimes form at the base of the wine and around the cork and are unacceptable from a wine quality and consumer perspective.

COMMENTS

4. NZFGC supports the application and the amendment of the *Australia New Zealand Food Standards Code* (the Food Standards Code) to permit the addition of potassium polyaspartate to wine.
5. The EU permits potassium polyaspartate as a stabiliser for the same purpose as is being applied for by this applicant and at the same maximum level. The International Code of Oenological Practices makes reference to the use of potassium polyaspartate at the same levels.
6. Approval in the EU in October 2017 followed a major European project called Stabiwine, initiated in 2012 and which resulted, after 5 years, in the identification of potassium polyaspartate to inhibit the formation of tartrate crystals even in highly unstable wines.
7. Tartrate stabilisation is an important phase of winemaking process and can be achieved by subtractive or additive processes. The mode of action of potassium polyaspartate is additive, in that it envelops the tartaric molecules as a “colloid protector” so that the tartaric acid bases never get close enough to initiate crystallization¹. While sustainability is not assessed by FSANZ, this substance is proving more sustainable than other methods of stabilisation in relation to water, chiller and labour use.
8. In assessing the additive, FSANZ considered the technological and assessed hazard and dietary exposure. There is currently an identity and purity specification for potassium polyaspartate in the Food Standards Code and its technological function as a stabiliser has been demonstrated.
9. Potassium polyaspartate is likely to result in minimal gastrointestinal degradation and absorption, it is not genotoxic and no adverse effects were observed in toxicity studies designed to test to this aspect.

¹ Wines & Vines, <https://www.winesandvines.com/newsbriefs/article/194235/Two-New-Products-Stabilize-Tartrates-in-Wine> October 2018

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10. FSANZ conducted a dietary exposure assessment and, after determining these, concluded that the toxicity tests demonstrated a 1200 fold safety margin and no identifiable hazard. FSANZ concluded there were therefore no public health or safety concerns from the use of potassium polyaspartate in wine at the maximum levels proposed.
 11. The wine industry would benefit from approval of this food additive by increasing the choice for wine stabilisation and for competitive reasons with wines in Europe where the additive is already permitted.
 12. For all the foregoing reasons, NZFGC supports the application and the permission for potassium polyaspartate to be included in the Food Standards Code for use in wine at maximum levels of 100 mg/L.