



NEW ZEALAND WINE

PURE DISCOVERY

Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6036

2 June 2011

By email: submissions@foodstandards.gov.au

APPLICATION A1026 – MINIMUM ALCOHOL CONTENT FOR WINE SUBMISSION OF NEW ZEALAND WINEGROWERS

Thank you for the opportunity to comment on the Assessment Report for Application A1026 - Minimum Alcohol Content for Wine (the Application).

New Zealand Winegrowers (NZW) is the organisation that researches, promotes and represents the interests of New Zealand grape growers and winemakers. NZW was established in 2002 as a joint venture between the New Zealand Grape Growers Council Inc. and the Wine Institute of New Zealand Inc. Every grape grower and winemaker in New Zealand is a member of our organisation. Accordingly, NZW is recognized as New Zealand's principal wine industry organisation.

NZW supports the Food Standards Australia and New Zealand (FSANZ) recommendation that an amendment be drafted to reduce the minimum alcohol content prescribed in Standard 4.5.1 for wine and sparkling wine produced in Australia from 80 mL/L to 45 mL/L of ethanol at 20°C (i.e. 8% to 4.5% alc/vol). This support is based on the following findings of the Assessment Report:

- a) the amendment will align Standard 4.5.1 with EU export requirements under the Agreement between Australia and the European Community Agreement on Trade in Wine (Australia – EU Wine Agreement) and facilitate trade to the European market;
- b) it addresses a regulatory disadvantage compared to imported product which is not required to comply with the standard;

- c) it will remove a technical barrier to innovation in Australian low alcohol wine as the demand for the demand for low alcohol and low calorie wines increases internationally; and
- d) there are no public health and safety risks related to the Application.

Further, from a New Zealand wine industry perspective, we note that the Application does not apply to wine produced or imported into New Zealand. Accordingly, the New Zealand wine sector is not affected by the proposed amendment.

If you have any further queries regarding this matter, please contact me directly on (09) 916 1561 or john@nzwine.com

Yours sincerely,

NEW ZEALAND WINEGROWERS

A handwritten signature in black ink, appearing to read 'John Barker', with a horizontal line underneath.

Dr John Barker
General Counsel