



**BREWERS**  
**ASSOCIATION**

Brewers Association of Australia & New Zealand Inc

**Brewers Association of Australia and New Zealand  
Submission to  
Food Standards Australia New Zealand**

**A1103 – Citric & Lactic Acids as Food Additives in  
Beer and Related Products**

**24<sup>th</sup> February, 2014**

## Summary

The Brewers Association of Australia and New Zealand (Brewers Association) welcomes the opportunity to provide comment on Application A1103.

Australian members of the Brewers Association comprise Carlton & United Breweries, Coopers and Lion Co that produce and distribute around 95% of domestically brewed beer. New Zealand members comprise DB Breweries and Lion Co who are similarly the major brewers in the New Zealand market.

While the Application has been made by one member of this Association, the other members of the Association see the potential benefits in the greater flexibility it will bring to product development.

*The Brewers Association therefore both welcomes and supports the Application.*

## Discussion

The changing nature of the alcohol beverage market is apparent from any visit to a licensed premises with the once limited range of beer, wine and spirits being supplemented by a wide choice of cider and other fruit wines, spirit based mixes and pre-mixed cocktails, both local and imported. This is not only occurring in the Australian and New Zealand markets but also in international markets as well. In all of these markets innovation has become key and products, sometimes successful and sometimes not, continue to flood the shelves.

The brewing industry is not averse to challenge and welcomes the opportunity to compete. There are however limitations imposed by the brewing process itself which impact on the ability of brewers to innovate successfully.

An example of this is lower alcohol beers. Fermentation not only converts sugars to alcohol and carbon dioxide but also produces acidity which in turn complements the flavour of the product. Where fermentation is restricted to limit alcohol formation, there is a corresponding impact on acidity. The product often has many positive attributes but does not always have optimal mouthfeel which depends on many factors including acidity (pH). The ability to increase the acidity by use of weak acids such as citric and lactic acids will therefore significantly assist in the availability of improved lower alcohol beers, which in turn will meet the needs of the many consumers seeking to moderate their alcohol consumption.

Such comments are also relevant to the ability to produce flavoured beers where increased acidity often is beneficial to the flavour of the products.

Permission to use such acids is already in place in a number of other jurisdictions, including the USA, Canada and Europe. Such products cannot however be sold as beer in Australia and New Zealand, and indeed cannot be sold in New Zealand supermarkets if they are labelled as a beer products. Relabelling of these products for the relatively small Australian and New Zealand markets is likely to be prohibitively expensive and unlikely to occur for many overseas products. The acceptance of

this Application will provide access to local markets for such products and at the same time offer Australian and New Zealand brewers the same permission that already exists in such countries.

Such permissions already exist for grape, and fruit and vegetable wines which is consistent with the lack of any concerns about the safety of citric and lactic acid additions (consistent with GMP) for consumers.

The Brewers Association is of the view therefore that this Application

- improves the ability of brewers to develop new products, particularly lower alcohol and flavoured beers, and therefore to compete with the wide spectrum of products based upon other alcohol beverages
- facilitates the import of beers produced in other countries where permissions for citric and lactic acid additions are already in place
- allows consistency for beer in the Food Standards Code in relation to the permissions for these acids in wine
- agrees with the Applicant's view that the addition of these acids to beer according to GMP does not result in any technical risk or safety concerns for consumers. Indeed these acids are already found in beer. Additions to increase acidity will increase the concentrations but for example the likely citric acid additions will result in levels still remain well below that found in citrus juices.
- will offer benefit to all brewers

The Brewers Association is therefore supportive of the Application.