

Cider makers' Submission on Proposal P1025: Variation to ANZ Food Standards Code (Code)

The cider producers listed in Appendix 1 wish to make the following submission on Chapter 2, Part 7, Division 3 of the Draft Variation to the Code. The signatories understand that the intent of Proposal P1025 is not to alter the underlying intent of the Code and submit that the following points simply clarify existing practice and understanding of the Code. The listed cider makers have agreed to make this submission en masse to better represent common understanding and practices across the industry as represented by these parties.

Suggested drafting changes are set out in Appendix 2 to this submission.

1. Pear Cider / Perry

We submit that the term 'pear cider' be added as an alternative name for 'perry' to recognise common use and common consumer understanding of this term, as well as conformity to international cider standards, including the UK.

The term pear cider is used interchangeably with the term perry to mean a fruit wine made from at least 75% pear and the balance from apples. This is an existing practice and we request that the Code clarify that this is acceptable by making the change requested. This clarification, if made, should be reflected in all associated provisions currently referring to "perry".

2. Permitted ingredients to a perry/pear cider or cider

We further submit that the definitions of 'cider' and 'perry'/'pear cider' should be reworded to clarify that ciders (including perry/pear cider) are to be made from the fruits (including juices and juice products) of apples and pears only.

The previous wording allowed an interpretation that the juices of other fruits could be added to a cider and the final product still represented as a cider. The signatories to this submission agree that such products would still be classified as a 'fruit wine' but should not be regarded as a cider. For instance, a cider blended with strawberry juice should be labelled 'Cider with Strawberry' [or equivalent] and not Strawberry Cider.

We submit that this would assist in consumer understanding of what is a cider as opposed to a fruit wine. Apple and pear juice and juice products could still be added to ciders, consistent with this logic, but not the juices or juice products of other fruits and vegetables.

For the same reason, we submit that honey and spices be removed as permitted ingredients for a cider (including pear cider/perry). These ingredients have an accepted use in the preparation of fruit wines, but not ciders where they could be used to flavour a cider away from pear or apple.

Appendix 1 – Signatories

Boundary Road Brewery Ltd.

Redwood Cider Co.

Sprig & Fern Brewery

St Andrews Cider

Zeffer Brewing Co.

Appendix 2 – Suggested Drafting Changes

Division 3—Fruit wine and vegetable wine

2.69 Meaning of *fruit wine product* and *vegetable wine product*

In this Code:

fruit wine product or *vegetable wine product* means a food containing no less than 700 mL/L of fruit wine, or vegetable wine, or both fruit and vegetable wine, which has been formulated, processed, modified or mixed with other foods such that it is not a fruit wine or vegetable wine.

2.70 Compositional requirement for cider, mead, perry, fruit wine and vegetable wine

- (1) A food that is sold on the basis of a representation that it is a fruit wine, a vegetable wine or ‘mead’ must consist of:
 - (a) fruit wine, vegetable wine or mead, as appropriate; or
 - (b) fruit wine, vegetable wine or mead, as appropriate, with the addition of any of the following:
 - (i) fruit juice and fruit juice products;
 - (ii) vegetable juice and vegetable juice products;
 - (iii) sugars;
 - (iv) honey;
 - (v) spices;
 - (vi) alcohol;
 - (vii) water.

- (2) A food that is sold on the basis of a representation that it is ‘cider’ or ‘perry’/pear cider must consist of cider or perry/pear cider, as appropriate.

- (3) In this section:

cider means a food prepared from the complete or partial fermentation of the fruit wine prepared from the juice or must of apples and no more than 25% of the juice or must of pears, with the addition of any of the following:

- (i) apple and/or pear juice and/or apple and/or pear juice products;
- (ii) sugars;
- (iii) alcohol;
- (iv) water.

fruit wine or *vegetable wine*:

- (a) means a food prepared from the complete or partial fermentation of fruit, vegetable, grains, cereals or any combination or preparation of those foods; and
- (b) does not include wine or wine product.

mead means the product prepared from the complete or partial fermentation of honey.

Perry ***or pear cider*** means a food prepared from the complete or partial fermentation of the fruit wine prepared from the juice or must of pears and no more than 25% of the juice or must of apples, with the addition of any of the following:

- (i) apple and/or pear juice and/or apple and/or pear juice products;
- (ii) sugars;
- (iii) alcohol;
- (iv) water.

Note: Under section 1.06, ***cider, fruit wine, mead, perry*** and ***vegetable wine*** are defined for the rest of this Code as a food that may be sold as cider, fruit wine, mead, perry, ***pear cider*** or vegetable wine under this section.