

Food Standards Australia New Zealand  
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AUSTRALIA

16 December 2014

### **Consultation Paper – Proposal 1034 Chemical Migration from Packaging into Food**

I am writing on behalf of Winemakers' Federation of Australia (WFA) in response to the Consultation Paper – Proposal 1034 Chemical Migration from Packaging into Food.

Winemakers' Federation of Australia (WFA) is the peak industry body representing the interests of Australia's winemaking sector. With members representing around 90% of the value Australian wine production drawn from large, medium and small businesses WFA speaks on behalf of the whole industry. WFA is recognised by the Australian government in legislation as a representative body for the interests of Australia's winemaking community. WFA plays an active partnership role with the government in international and technical negotiations concerning the interests of the wine sector.

WFA is delighted that FSANZ is undertaking an assessment of the public health and safety risks relating to chemical migration from packaging into food. While wine is a low risk product for this issue as it is primarily packed in inert packaging material (glass) with closures that are well researched, as innovation proceeds, alternative packaging materials are more likely to be considered. The wine industry is deeply committed to consumer health, safety and satisfaction and welcomes initiatives aimed at ensuring such packaging materials are fit-for-purpose.

The Australian wine sector has also seen at first hand where issues relating to chemical migration have had serious impacts on trade.

I would like to draw your attention to two case studies.

First Bisphenol A (BPA) has made a lot of news in the past decade.

BPA is ethanol soluble, and traces have been reported to be found in wine. The source of BPA has been reported to be in packaging (bag-in-box wine or bottles sealed with closures other than cork (either plastic cork-replacements or screw caps lined with plastic), or from epoxy resin used in pipes and storage vessel.

However, packaging companies, including producers of plastic bags for bag-in-box wine, synthetic cork producers and makers of screw caps have made sure that packaging materials do not contain and therefore are not a source of BPA. I would also add that epoxy resin liners in fermentation vats and storage tanks are uncommon in Australia.

However, uninformed press reports have suggested that wine sealed with non-cork closures may result in the transmission of small quantities of BPA. While such stories are clearly and demonstrably false, they can have an adverse effect on sales. Improved regulations relating to the migration of chemicals into food would enhance the ability to prevent such reports.

The second trade issue concerns phthalates.

Phthalates are not chemically bound to the materials, and can be released from them. Accordingly they are ubiquitous in the environment and background levels are found in all foods and beverages. They are also absorbed into the body through inhalation and skin contact.

In the grape and wine industry, sources of phthalates in wine will include hoses, coatings and/or linings, paints, pipes and tanks.

Phthalates can have adverse effects on human health, in particular, affecting (endocrine) hormones, kidney and liver function and fertility, and can cause certain cancers as well as neuro-developmental abnormalities and disorders in children. Accordingly, international health and safety agencies, such as the European Commission's Scientific Committee for Food, have evaluated the phthalates and established no observable adverse effects levels (NOAELs) and tolerable daily intakes (TDI) for them based on animal and human studies. These are effectively thresholds, above which risks to human health increase. Those most at risk are workers producing the plastic materials, and to a lesser extent, women and children.

While there are many different (although related) chemical forms of phthalates, those of interest to the grape and wine industry are: di(2-ethylhexyl) phthalate (DEHP), diisononyl phthalate (DINP) and dibutyl phthalate (DBP). Recommended maximum limits for these phthalates in foods and beverages such as wine have been established by some countries and international organizations.

Following concerns in Chinese Taipei and China about the level of phthalates in domestic and foreign distilled beverage products, the Ministry of Health (MOH - sets national food safety standards) and AQSIQ (enforcement) joined forces in a surveillance project to garner data for product risk assessments. Although China had adopted the EU standards for phthalates in containers, packaging and migration levels (see MOH Circular 551), no international or Chinese standard established a limit for plasticizer in the food product itself.

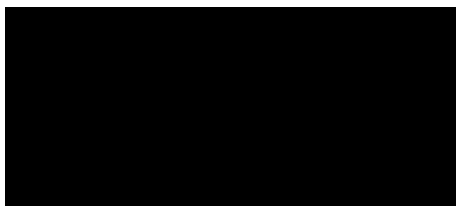
As a result, some importers of wine into China began to demand certificates demonstrating the wine complies with limits established for various plasticisers. In the past screwcaps have been incorrectly linked with the presence of plasticisers in wine.

This caused large problems for wine exporters and much additional cost.

Part 6 of the consultation paper concerns the consultation process around this issue. Winemakers Federation of Australia has two committees which deals with issues relating this subject - the Wine Industry Technical Advisory Committee (WITAC) and the Wine Industry Packaging Committee. Both these committees have representatives from the Wine industry Suppliers association (WISA) and packaging has regular attendee at committees of the key packaging companies relating to wine packaging. Through WFA both committees are willing to provide consultation opportunities for FSANZ and to provide technical input to this process.

I am happy to provide further information in support of this submission if required. Please do not hesitate to contact [REDACTED] to discuss this further.

Yours sincerely



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