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Wine Making Additives: Codex Committee on Food Additives – Progress on International Harmonisation of Additives

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Codex Committee on Food Additives – progress on international harmonisation of additives

Presentation to the APEC Wine Regulatory Forum

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Background

- **The key element to addressing differing compositional requirements for wine between international markets is through harmonisation.**
- **Increasingly, developing markets and non-wine producing economies are basing their compositional requirements on Codex Alimentarius Commission General Standard for Food Additives.**
- **This is to minimise technical barriers to trade.**

Issues

- To maximise opportunities to harmonise wine additives requires the addition of key additives into the General Standard of Food Additives (GSFA) via the Codex Committee on Food Additives and then follow-up activity to encourage their adoption in key markets.
- Harmonisation of wine additives will provide guarantees for wine quality and safety (although we should note that wine is a low risk product from a micro-biological perspective).
- Currently, only five additives (dimethyl dicarbonate, lysozyme, sorbates, CO_2 and sulphites) are currently listed for the food category 14.2.3 “Grape wines”. Caramel III and IV are permitted for use in fortified wines

CCFA developments

- The Codex Committee on Food Additives (CCFA) held its Forty-Ninth Session in Macao SAR, China, from 20 to 24 March 2017, The Session was attended by 50 Member countries, one Member organization and 32 observer organizations.
- Discussions regarding food additive provisions in GSFA category 14.2.3 “Grape Wines” has centred on the addition of several additives currently not listed in the GSFA though approved for use in several winemaking economies.
- These additives are Ascorbic Acid, Citric Acid, Fumaric Acid, Lactic Acid, Malic Acid, sodium carboxymethylcellulose and Gum Arabic.
- Following the failure of the 48th CCFA to add these additives to the GSFA last year, an electronic working group was established.

EWG on wine additives

- The 48th CCFA established an electronic working group (EWG), chaired by the European Union and co-chaired by Australia, with the following terms of references:
- *Taking account of the issues identified in CX/FA 16/48/13, and the positions expressed at the CCFA48 and in the various CRDs, including the EWG co-chair recommendations for food additives in wine (FC 14.2.3):*
- *(i) Develop and analyse recommendations for the amendment of the GSFA with respect to food additives in wine.*
- *(ii) Consider provisions for food additives belonging to the following functional classes: acidity regulators, stabilizers and antioxidants.*

EWG on wine additives

- The report of the EwG was presented to the 49th meeting of the CCFA and reflected the two opposing views within the CCFA.
- The first supports the use of good manufacturing practices (GMP) where the Joint FAO/WHO Expert Committee on Food Additives (JECFA) Acceptable Daily Intake for an additive is “Not Specified” as is the norm for CCFA.
- The second view proposes that additives with no health, safety or technological concerns should be restricted to a Numerical Maximum Limit (Numerical ML) as determined by the International Organization of Wine and the Vine (OIV).

EWG recommendations

- **Discussion of recommendations of the following additives to be added the General Standard for Food Additives (GSFA) for use in wine, with a use level of GMP was dependent on the addition of a footnote:**
- **Citric acid (INS 330);**
- **Lactic acid L-, D- and DL- (INS 270);**
- **Malic acid DL- (INS 296);**
- **Tartaric acid L(+) (INS 334);**
- **Ascorbic acid (INS 300);**
- **Gum Arabic (INS 414); and**
- **Sodium carboxymethylcellulose (INS 466)**

EWG recommendations

- Two footnotes were proposed:
- Endorsement by CCFA of the principle that, if JECFA recommends an additive with ADI not specified, the Maximum Level of this additive authorised in grape wine is set at GMP with the reference **to one** of the following footnotes:
- A: “The Maximum level of the additive in grape wine set as Good Manufacturing Practice must not result in (i) the modification of the natural and essential characteristics of the wine and (ii) a substantial change in the composition of the wine and should be consistent with those of the International Organisation for Vine and Wine (OIV).“
- B: “The Maximum level of the additive in grape wine set as Good Manufacturing Practice must not result in (i) the modification of the natural and essential characteristics of the wine and (ii) a substantial change in the composition of the wine. This maximum level may be further specified to be consistent with those of the International Organisation for Vine and Wine (OIV)."

No agreement was reached

- Key issues preventing agreement were (and are):
- The European Union needs OIV to be mentioned as a reference body and are seeking it as the only reference body.
- The European Union want to close off the opportunity for other standard setting bodies /or international bodies to be referenced.
- The European Union wants limits recommended by the OIV to be adopted into the GSFA
- Many other economies will not accept the OIV as a sole reference body and wish to preserve the Codex General Principle of not setting numerical limits when there is no allowable daily intake specified.

Next steps

- The Codex Secretariat clarified that as a result of this discussion, the draft and proposed draft provisions for wine would continue to be held at Step 7 and 4 respectively and that members would have the possibility to reopen discussion and make proposals on how to advance work on these provisions.
- In the meantime, these additives have not been added to the GSFA despite the fact they are safe and have a technical necessity.
- This causes a potential barrier to trade.

Political interference in the scientific setting of Codex Standards

- Most of the current comments with the exception of the European Union countries reflect normal Codex policy. That is, GMP is appropriate where no numerical Allowable Daily Intake has been set following a JECFA assessment.
- However, this is highly political issue and many OIV members wish to have this body referenced.
- This precedent is concerning for non-OIV members and moves to have limits set that are not based on science are considered by many to set poor precedent for other food stuffs.

Conclusion

- **We are encouraging all Codex members to preserve the integrity of the GSFA and unless scientific justification or a health and safety reason for a limit can be provided then GMP is appropriate.**
- **Codex members should not establish international standards based on political considerations.**
- **The additives under consideration should be approved regardless of the footnote as they are commonly used internationally, have no health or safety implications and have a proven technical function.**
- **We are now hoping that APEC member economies will act bilaterally to approve these additives.**