

Food Standards Australia New Zealand
APPLICATION A1077 FUNGAL CHITOSAN AS A PROCESSING AID
Call for Submissions
6 September 2013

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to make a submission on *Application A1077 Fungal Chitosan as a Processing Aid*.

New Zealand Food & Grocery Council

The NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. Collectively this sector generates over \$28 billion in the New Zealand domestic retail food, beverage and grocery products market and over \$26 billion in export revenue from exports to 183 countries. Food and beverage manufacturing is the largest manufacturing sector in New Zealand representing 46% of total manufacturing income and 34% of all manufacturing salaries and wages.

Food and beverage manufacturing and wholesaling in New Zealand directly employs over 100,000 people (5% total employment) and, when taking the wider food and beverage value chain (including farming and food retailing/foodservice) into account, employment soars to almost 350,000 in over 85,000 enterprises. This represents around one in five people employed in our country.

No matter how you look at it, the New Zealand food, beverage and grocery sector makes a substantial contribution to the New Zealand domestic economy, to our exports and to the general economic well-being of the country.

Application A1081

The NZFGC understands that permission is sought to use chitosan sourced from *Aspergillus niger* as a processing aid in the production of wine, beer, cider, spirits and food grade ethanol. Chitosan has a number of technical functions as a processing aid depending on the beverage to which it is applied:

- fining agent for wine
- stabilisation agent for colour retention
- assist in clarification (riddling) of sparkling wine
- clarifying agent to remove unstable colloids and reduce cloudiness
- clarifying agent to remove mineral and organic contaminants
- removal of microbial contaminants (such as *Brettanomyces*)
- encapsulation of yeast, lactic acid and nutrients (potential future use).

Comments

NZFGC supports the permission being sought for chitosan sourced from *Aspergillus niger* as a processing aid in the production of wine, beer, cider, spirits and food grade ethanol. Internationally, as FSANZ reports, the substance is permitted for use in winemaking for a

variety of purposes through resolutions of the International Organisation of Vine and Wine (OIV) and has determined specifications for fungal chitosan in its International Oenological Codex. Chitosan is listed by Codex as a processing aid in the Codex General Standard for Fruit Juices and Nectars and approved as a processing aid in the EU, the USA and Argentina. It is approved as a food additive in Japan.

The safety assessment conducted by FSANZ considered, as is usual, toxicity, hazard characterisation and residual levels in food. The allergenic potential of products derived using fungal chitosan as a processing aid was identified as negligible and testing of wine processed with fungal chitosan has indicated that the final product was free from chitosan at the limit of detection (10 mg/L). FSANZ concluded that overall the use of fungal chitosan as a processing aid for the production of alcoholic beverages and food grade ethanol is technologically justified and raises no public health and safety concerns for consumers.

There may well be benefits to governments from accepting the variations through increased trade although these would be indirect. There could be direct costs to the consumer of not having the choice of products in which this processing aid has been used.

NZFGC considers a broadening of the availability of processing aids at safe levels enhances the choices available to manufacturers for the production process. NZFGC therefore supports the draft amendment as proposed by FSANZ.