



JOHN BARKER LAW

EXECUTIVE SUMMARY

APPLICATION TO AMEND THE AUSTRALIA NEW ZEALAND FOOD STANDARDS CODE: INCLUSION OF CITRIC AND LACTIC ACIDS AS FOOD ADDITIVES IN BEER

This application is made [REDACTED] on behalf of DB Breweries [REDACTED]. The application was prepared by John Barker Law [REDACTED]

The application is to amend the Australia New Zealand Food Standards Code by including citric acid and lactic acid to Standard 1.3.1, Schedule 1: 14.2.1 at GMP levels. This will allow citric acid and lactic acid to be used as food additives in beer.

The Applicant believes that the appropriate procedure is the General Procedure Level 1.

The amendment is needed to facilitate the production of lower-strength and flavoured beers. The approval of the application will:

- promote innovation in the beer sector, particularly in the development of new lower-strength beer styles;
- ensure that labelling and permissions for additives are consistent across the categories of standardised fermented alcoholic beverages in the Food Standards Code;
- ensure that labelling and permissions for additives are consistent with international trading partners and international obligations.

The Applicant considers that these outcomes will benefit consumers by greater availability of innovative products, particularly lower-strength and flavoured beers. Citric acid and lactic acid are widely permitted as food additives for beer production around the world, including in the General Standard on Food Additives. Consequently, approval of this application would have positive trade implications. It would not impose additional costs on government, producers or consumers.

The Applicant does not believe that the application is likely to be opposed by other beer producers since its benefits will be available to all of them equally.

The application is consistent with FSANZ's obligation to protect public health and safety because citric and lactic acids are found throughout the food supply and have been evaluated as safe by the Joint Expert Committee of Food Additives (JECFA) and other institutions.

JECFA monographs and specifications for both substances are available, as well as relevant reviews from USFDA and EFSA. Appropriate methods of analysis are available.