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11 August 2016

To FSANZ,

RE: Submission - Application 1119 – Addition of Water to Aid Wine Fermentation

In response to the open Application 1119, I wish to inform you that Pernod Ricard Winemakers Pty Ltd has reviewed the proposal and submits the following comments for consideration.

From a technical point of view we agree that there is a need to allow water additions to facilitate fermentations of high sugar grape musts in Australia. We recognise that in recent vintage years there have been difficult climatic conditions resulting in high sugar fruit leading to stuck fermentation, and hence the ability of reducing sugar content through water additions would have been useful at the time.

However, considering that the US regulation allows for a reduction to 22°Brix/12.2° Baumé and from our experience a 15 degrees Baumé grape must can still lead to stuck fermentations, we propose that the adjustment limit is changed to 13.5 degrees Baumé. In addition, we propose that the adjustment shall not exceed a reduction of 2 Baumé in order to prevent a downgrade of final wine quality.

We therefore suggest that section (7B) listed in Appendix A under Schedule [3] Standard 4.5.1 is changed to:

Water added to dilute high sugar grape must to facilitate fermentation shall not dilute the grape must below 13.5 degrees Baumé. The degrees Baumé of high sugar grape musts shall not be reduced by more than 2 degrees Baumé.

We also propose that the timing of water addition needs to be further considered with respect to the main purpose i.e. to facilitate fermentation. Following good manufacturing practices this would ideally occur prior to must fermentation.

The technical benefits to the Australian Wine Industry aside, it is essential that the proposed practice is compliant with all export markets' regulations. Proposal A1119 has considered US regulations, EU regulations, the "Agreement between the European Community and the United States of America on trade in wine" and "The WWTG 2001 Mutual Acceptance Agreement (MAA) on Oenological Practices (MAA)", but there has been no consideration of other export markets' regulations. We are concerned that some markets will not accept the proposed practice and therefore recommend a review of all major export markets' regulations.



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For example the Indian regulations endorse OIV guidelines. This means that wines made in accordance with these guidelines are accepted, but there is no provision of water additions in these guidelines (except for “permitted for specific technical necessity”), and therefore this would put Australian wines made with added water at risk of non-compliance.

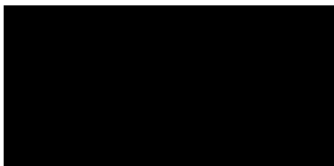
Another point to consider is that water additions may result in lower dry extract concentrations. This is particularly relevant to markets where regulations have limits in place such as in China where the sugar free dry extract is specified. We are aware that there have been occasions where Australian wines have been rejected that did not meet this requirement.

If the proposal is accepted, we believe there will also be a need to update the “Agreement between Australia and the European Community on Trade in Wine”.

We trust that our comments will be taken in consideration.

Yours sincerely,

PERNOD RICARD WINEMAKERS



BRETT MCKINNON

Global Operations Director