



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

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DISCUSSION PAPER ON THE USE OF FOOD ADDITIVES IN THE PRODUCTION OF WINE (Food category N° 14.2.3 "Grape wines")

Comments of Chile, Ghana, Indonesia, Nigeria, Russian Federation, Senegal, African Union, Oenopia, OIV

CHILE

a. Introduction

The 47th Session of the Codex Committee on Food Additives (CCFA47) agreed to establish an electronic WG, chaired by France and co-chaired by Australia, open to all members and observers, and working in English only, with the following terms of references:

In the context of the general use of the following functional classes of additives in the production of wine:

- *emulsifiers;*
- *stabilizers;*
- *thickeners;*
- *acidity regulators;*
- *antioxidants*

a) Provide clarity and specificity on the general concerns of

- *wine identity;*
- *wine stability;*
- *global applicability of limitations for the use of food additives in wine; and*
- *innovation in wine production.*

b) Based on the outcome of point "a" above, perform an examination on the effect of expressing a maximum use of additives in wine:

- *on a Numerical Basis; and*
- *as GMP*

Thus, the eWG proposes the following:

Recommendation 1

Regarding the use of an additive in the food category 14.2.3 and its subcategories, the Chair and coChair of the eWG suggest that the CCFA adopt the principle that, if JECFA recommends an additive has no Allowable Daily Intake (ADI), then a GMP limit should be applied with reference to the following footnote:

* *The maximum level of the additive in grape wine set as good manufacturing practice must prevent (i) the modification of the natural and essential characteristics of the wine and (ii) a substantial change in the composition of the wine. Countries may seek guidance on GMP from internationally recognized bodies with expertise in oenological practices, such as the International Organisation of Vine and Wine (OIV, which recommends conditions for use for additives in wines) and the Joint FAO/WHO Expert Committee on Food Additives (JECFA, which assesses food additives for their safety and recommends specifications for those additives).*

Recommendation 2

If recommendation 1 is adopted, the Chair and co-Chair of the eWG suggest that the CCFA adopt the seven following additives whose adoptions were pending an agreement on the maximum level of use⁶;

- a. Citric acid (INS 330) with the technological function “acidity regulator” at GMP with the footnote proposed in recommendation 1, in food category 14.2.3 (Grape wines) and its subcategories;
- b. Lactic acid L-, D-and DL- (INS 270) with the technological function “acidity regulator” at GMP with the footnote proposed in recommendation 1, in food category 14.2.3 (Grape wines) and its subcategories;
- c. Malic acid DL- (INS 296) with the technological function “acidity regulator” at GMP with the footnote proposed in recommendation 1, in food category 14.2.3 (Grape wines) and its subcategories;
- d. Tartaric acid L(+)- (INS 334) with the technological function “acidity regulator” at GMP with the footnote proposed in recommendation 1, in food category 14.2.3 (Grape wines) and its subcategories;
- e. Ascorbic acid (INS 300) with the technological function “antioxidant” at GMP with the footnote proposed in recommendation 1, in food category 14.2.3 (Grape wines) and its subcategories;
- f. Gum arabic (INS 414) with the technological function “stabilizer” at GMP with the footnote proposed in recommendation 1, in food category 14.2.3 (Grape wines) and its subcategories;
- g. Sodium carboxymethylcellulose (INS 466) with the technological function “stabilizer” at GMP with the footnote proposed in recommendation 1, in food category 14.2.3 (Grape wines) and its subcategories.

⁶ see [CX/FA 15/47/10](#) y el [Table II of FA/48INF/01](#).

b. Background

a. Citric acid (INS 330)

Purpose: acidity regulator.

Definition: **NML** 1 g/L. Citric acid can be used for the chemical acidification of wine because of its stabilizing action, particularly on limiting the risks of ferric breakage or for the pre-wash of filtering plates. The maximum content in wine can be subject of regulatory limitations (OENO 23/2000).

b. Lactic acid (INS 270)

Purpose: acidity regulator

Definition: **GMP** (OENO 29/2003). Acid of natural origin obtained from the lactic fermentation of sugars or synthetically produced; it can contain products derived from condensation such as lactate and lactic acid and DL-lactic. Its purpose of use is acidification of musts and wines under conditions established by the regulation.

c. Malic acid (INS 296)

Purpose: acidity regulator

Definition: **GMP** (OENO 30/2004). Acid of natural origin present on most fruit parts (as L-malic acid) or synthetically produced; DL-malic is used for the acidification of musts and wines under conditions established by the regulation.

d. Tartaric acid (INS 334)

Purpose: stabilizer and acidity regulator

Definition: **GMP** (OENO 4/2008). Treatment produces, mainly, insoluble salts. An oenologists or specialist technician has to supervise the treatment, and the products to which the acid is added must adjust to the *International Oenological Code*.

e. Ascorbic acid (INS 334)

Purpose: acidity regulator.

Definition: **NML** 150 mg/L (OENO 12/2001). Product of the antioxidant category, reductant agent used to avoid oxidation. Its use is subject to regulatory limitations.

f. Gum arabic (INS 414)

Purpose: stabilizer of bottled wines.

Definition: **NML** 0,3 g/L (OENO 27/2000). Gum arabic is constituted by a polysaccharide rich in galactose and arabinose, and of a small protein fraction that gives it its stabilizing power to avoid precipitation of dye material and ferric and cuprous breakage. Gum arabic is presented in the form of powder or colloidal suspension.

g. Sodium carboxymethylcellulose (INS 466)

Purpose: stabilizer

Definition: **NML** 100 mg/L (OENO 2/2008). Carboxymethylcellulose contributes to tartaric stabilization of wine and sparkling wine.

c. Proposal for recommendation 1

Members are encouraged to support recommendation 1, but only for such products for which there is no numerical maximum limit (NML) defined by recognized international organisms with experience on oenological practices, such as the International Organization of Vine and Wine.

d. Proposal for recommendation 2

Members are encouraged to support recommendation 2, as it's presented on the document, for the following additives:

(b) lactic acid

(c) malic acid

(d) tartaric acid

These additives are already authorized as oenological practice by the OIV by its respective Resolutions.

Members are invited to adopt NMLs recommended by OIV, which have the same technological purpose already established on recommendation 2, with the following numeric values:

(a) citric acid: 1 g/L

(e) ascorbic acid: 150 mg/L

(f) Gum arabic: 0,3 g/L

(g) carboxymethylcellulose: 100 mg/L.

These NML have been determined on the scientific basis, thus allowing to assure in an objective way safety of the final product.

Furthermore, it should be noticed that the Agreement on Sanitary and Phytosanitary Measures of the World Trade Organization (WTO), for which Codex Alimentarius is a relevant international organization on food safety, establishes that sanitary measures established by Members must be based on scientific principles.

It should also be noted that Codex Alimentarius is a relevant organization under the Agreement on Technical Barriers to Trade of the WTO, for measures related to quality, and product genuineness, amongst others, in general terms related to the Codex objective of ensuring fair practices to trade.

a. Los hechos

Durante la 47.^a reunión del Comité del Codex sobre Aditivos Alimentarios (CCFA47) se acordó establecer un grupo de trabajo por medios electrónicos, presidido por Francia y copresidido por Australia, abierto a todos los miembros y observadores, donde se solicitó a los países la siguiente información:

En el contexto del uso general de las clases funcionales emulsionantes, estabilizadores, espesantes, reguladores de la acidez y antioxidantes en la producción del vino:

a) Proporcionar claridad y especificidad sobre los temas generales de la identidad, estabilidad, aplicabilidad, las limitaciones para el uso de aditivos alimentarios en el vino; y la innovación en la producción vinícola.

b) Sobre la base del resultado del punto "a" anterior, llevar a cabo un estudio sobre el efecto de expresar un uso máximo sobre una base numérica y como BPF de aditivos en el vino.

Resultado de lo anterior y según las observaciones recopiladas, el GTe realiza las siguientes recomendaciones:

Recomendación 1

En relación con el uso de un aditivo en la categoría de alimentos 14.2.3 y sus subcategorías, la presidencia y la copresidencia del GTe recomiendan que el CCFA adopte el principio de que si el JECFA recomienda que un aditivo no tenga una ingestión diaria admisible (IDA), entonces se deberá aplicar un límite de BPF con referencia a la nota siguiente:

** El nivel máximo del aditivo en los vinos de uva establecido como buena práctica de fabricación debe impedir (i) la modificación de las características naturales y esenciales del vino y (ii) un cambio sustancial en la composición del vino. Los países pueden solicitar orientación sobre BPF de organismos reconocidos internacionalmente con experiencia en prácticas enológicas, como la Organización Internacional de la Viña y el Vino (OIV, que recomienda condiciones para el uso de los aditivos en los vinos) y el Comité Mixto FAO/OMS de Expertos en Aditivos Alimentarios (JECFA, que evalúa los aditivos alimentarios respecto a su inocuidad y recomienda especificaciones para esos aditivos).*

Recomendación 2

Si se aprueba la recomendación 1, la presidencia y la copresidencia del GTe recomiendan que el CCFA adopte los siguientes siete aditivos cuya adopción estaba a la espera de un acuerdo sobre el nivel máximo de uso;⁶

- a. Ácido cítrico (SIN 330) con la función tecnológica de "regulador de la acidez" en dosis de BPF con la nota propuesta en la recomendación 1, en la categoría de alimentos 14.2.3 (Vinos de uva) y sus subcategorías.
- b. Ácido láctico L-, D- y DL- (SIN 270) con la función tecnológica de "regulador de la acidez" en dosis de BPF con la nota propuesta en la recomendación 1, en la categoría de alimentos 14.2.3 (Vinos de uva) y sus subcategorías.
- c. Ácido málico DL- (SIN 296) con la función tecnológica de "regulador de la acidez" en dosis de BPF con la nota propuesta en la recomendación 1, en la categoría de alimentos 14.2.3 (Vinos de uva) y sus subcategorías.
- d. Ácido tartárico L(+)- (SIN 334) con la función tecnológica de "regulador de la acidez" en dosis de BPF con la nota propuesta en la recomendación 1, en la categoría de alimentos 14.2.3 (Vinos de uva) y sus subcategorías.
- e. Ácido ascórbico (SIN 300) con la función tecnológica de "antioxidante" en dosis de BPF con la nota propuesta en la recomendación 1, en la categoría de alimentos 14.2.3 (Vinos de uva) y sus subcategorías.
- f. Goma arábiga (SIN 414) con la función tecnológica de "estabilizador" en dosis de BPF con la nota propuesta en la recomendación 1, en la categoría de alimentos 14.2.3 (Vinos de uva) y sus subcategorías.

⁶ Véase [CX/FA 15/47/10](#) y el [Cuadro II de FA/48INF/01](#).

b. Antecedentes

a. Ácido Cítrico.

Empleo: Corrección de acidez. El ácido cítrico puede ser utilizado para la acidificación química de los vinos o por su acción estabilizante particularmente para limitar los riesgos de quiebras férricas o para el prelavado de placas filtrantes. El contenido máximo en los vinos puede estar sometido a límites reglamentarios (OENO 23/2000).

b. Definición: LMN 1 g/L. Ácido Láctico.

Empleo: Corrección de acidez.

Definición: **BPF** (OENO 29/2004). Acido de origen natural obtenido por la fermentación láctica de los azúcares o elaborado sintéticamente; puede contener productos de condensación tales como el lactato del ácido láctico y del D,L-láctico. Se utiliza para la acidificación de los mostos y de los vinos en las condiciones establecidas por la reglamentación.

c. Ácido Málico.

Empleo: Corrección de acidez.

Definición: **BPF** (OENO 30/2004). Acido de origen natural contenido en la mayor parte de las frutas (se trata entonces del ácidoL-málico) o elaborado sintéticamente: D,L-málico Se utiliza para la acidificación de los mostos y de los vinos en las condiciones fijadas por la reglamentación.

d. **Ácido Tartárico.**

Empleo: Estabilización y corrección de acidez.

Definición: **BPF** (OENO 4/2008). El tratamiento produce fundamentalmente sales insolubles, un enólogo o técnico especialista ha de supervisar el tratamiento, y los productos que se añadan deberán ajustarse a las disposiciones del *Código enológico internacional*.

e. **Ácido Ascórbico.**

Empleo: Corrección de acidez. Producto de la categoría de los antioxidantes, agente reductor empleado para evitar la oxidación. Su empleo está sometido a límites reglamentarios.

Definición: LMN 150 mg/L (OENO 12/2001)

f. **Goma Arábica.**

Empleo: Producto destinado a mejorar la estabilidad de los vinos en botella.

Definición: LMN 0,3 g/L (OENO 27/2000)

La goma arábica está constituida por un polisacárido rico en galactosa y arabinosa y de una pequeña fracción proteica que le confiere su poder estabilizador frente a las precipitaciones de las materias colorantes y las quiebras férricas y cuprosas. Esta goma arábica es presentada en forma de polvo o bien en solución coloidal.

g. **Carboximetil celulosa.**

Empleo: Estabilización.}

Definición: **LMN** 100 mg/L. (OENO 2/2008). La Carboximetil celulosa contribuye a la estabilización tártrica de los vinos blancos y de los vinos espumosos..

a. **Propuesta sobre la Recomendación 1**

Se alienta a los Miembros del Codex a apoyar la recomendación 1, pero solo para aquellos casos en que no se ha definido un Límite Máximo Numérico (LMN) por organismos reconocidos internacionalmente con experiencia en prácticas enológicas, como la Organización Internacional de la Viña y el Vino.

b. **Propuesta sobre la Recomendación 2**

Se alienta a los Miembros del Codex a apoyar la recomendación 2, tal como está planteada para los siguientes aditivos:

(b) Ácido láctico, (c) ácido málico y (d) ácido tartárico:

Estos aditivos se encuentran autorizados como practica enológica por la OIV a través de sus correspondientes Resoluciones.

Se propone se adopten los LMN recomendados por la OIV, con las mismas funciones tecnológicas planteadas en la recomendación 2 y con los valores siguientes:

(a) Ácido cítrico: 1 g/L

(e) Ácido ascórbico: 150 mg/L

(f) Goma arábica: 0,3 g/L

(g) Carboximetilcelulosa: 100 mg/L.

Los LMN son determinados en base a procedimientos científicos, lo que permite asegurar de manera objetiva la inocuidad del producto final.

Adicionalmente, cabe señalar que el Acuerdo de Medidas Sanitarias y Fitosanitarias de la Organización Mundial del Comercio (OMC), para el cual el Codex es referente en materia de inocuidad de los alimentos, establece que las medidas establecidas por sus países Miembros deben estar fundamentadas en principios científicos.

Por otra parte también debe considerarse que el Codex es referente del Acuerdo de Obstáculos Técnicos de la OMC, para materias relacionadas a calidad, genuinidad del producto entre otras, en general aspectos inherentes al otro objetivo del Codex (prácticas leales al comercio).

GHANA

Specific Comments

Ghana supports the discussion paper on the use of food additives in the production of wine and recommends that CCFA adopts Good Manufacturing Practice (GMP) for food additives used in wine production that have no Acceptable Daily Intake (ADI). Ghana also agrees that, for such food additives the proposed footnote should be included to emphasize the quality and safety considerations associated with the adoption of a GMP.

Rationale: As discussed by other Codex member countries in the discussion paper, Ghana agrees with the understanding that setting numerical maximum limits would not be applicable in all wine production situations taking into consideration climatic conditions and the potential implications for trade barriers hence adopting a GMP could contribute to eliminating these challenges.

INDONESIA

Indonesia agrees with recommendation 1 and 2.

NIGERIA

Nigeria support recommendation 1 with the following amendment TO THE FOOTNOTE

The maximum level of the additive in grape wine set as good manufacturing practice must prevent (i) the modification of the natural and essential characteristics of the wine and (ii) a substantial change in the composition of the wine.

RUSSIAN FEDERATION

In our opinion recommendation 1 does not have conditions clear enough for use of food additives in grape wine: "good manufacturing practice must prevent (i) the modification of the natural and essential characteristics of the wine and (ii) a substantial change in the composition of the wine". It is recognized that using of food additives in food categories should have legitimate technical reasons for a reduced set of food additive permissions.

The next sentences "Countries may seek guidance on GMP from internationally recognized bodies with expertise in oenological practices..... " are not in frame of principles established by GSFA. The GSFA is being developed to be the reference point for food additives within Codex Alimentarius.

SENEGAL

Question: Pour répondre à des préoccupations des Etats membres sur l'effet de l'utilisation d'émulsifiants, des stabilisants, des épaississants, des régulateurs d'acidité et des antioxydants sur l'identité du vin; la stabilité du vin; l'innovation et de la production du vin; applicabilité mondiale des limitations d'utilisation des additifs alimentaires dans le vin; et de considérer l'effet d'exprimer une utilisation maximale des additifs dans le vin sur une base numérique et que GMP.

Position: Nous soutenons la recommandation 1 avec l'amendement à la note de pied de page comme suit:

Si le JECFA recommande qu'un additif n'a pas l'apport quotidien admissible (DJA), puis une limite de GMP doit être appliqué en référence à la note suivante:

* Le niveau maximal de l'additif dans le vin de raisin fixé comme bonnes pratiques de fabrication doit empêcher (i) la modification des caractéristiques naturelles et essentielles du vin et (ii) un changement important dans la composition du vin. ~~Les pays peuvent demander des conseils sur les BPF des organismes reconnus internationalement avec une expertise dans les pratiques œnologiques, telles que l'Organisation internationale de la vigne et du vin (OIV, qui recommande les conditions d'utilisation des additifs dans les vins) et le Comité FAO / OMS d'experts des additifs alimentaires (JECFA, qui évalue les additifs alimentaires pour leur sécurité et recommande les spécifications pour les additifs).~~

Justification :

(I) L'utilisation d'additifs alimentaires dans la production de vin ne devrait pas modifier les caractéristiques naturelles et essentielles du vin.

(li) Le Codex n'a pas de définition convenue pour un «organisme international reconnu»

AFRICAN UNION

Issue: To address member states concerns on the effect of use of emulsifiers, stabilizers, thickeners, acidity regulators and antioxidants on wine identity; wine stability; wine innovation and production; global applicability of limitations for use of the food additives in wine; and to consider the effect of expressing a maximum use of additives in wine on a numerical basis and as GMP.

Position: AU supports recommendation 1 with the following amendment to the footnote, to read:

If JECFA recommends that an additive has no Allowable Daily Intake (ADI), then a GMP limit should be applied with reference to the following footnote:

* The maximum level of the additive in grape wine set as good manufacturing practice must prevent (i) the modification of the natural and essential characteristics of the wine and (ii) a substantial change in the composition of the wine. ~~Countries may seek guidance on GMP from internationally recognised bodies with expertise in oenological practices, such as the International Organisation of Vine and Wine (OIV, which recommends conditions for use for additives in wines) and the Joint FAO/WHO Expert Committee on Food Additives (JECFA, which assesses food additives for their safety and recommends specifications for these additives).~~

Rationale:

(i) Use of food additives in wine production should not modify the natural and essential characteristics of wine.

(ii) Codex has no agreed definition for an "international recognized body"

OENOLOGICAL PRODUCTS AND PRACTICES INTERNATIONAL ASSOCIATION (OENOPPIA)

Oenology and wine additives

The ingredients used in wine (additives and processing aids) – also called 'oenological products' – are part of winemaking expertise. Skilled winemaking has always used substances to protect and stabilise a fragile environment subject to oxidation and contaminating micro-organisms. Current use of additives is based on over a century of oenological advances in promoting optimum expression of wine. Oenology is the science of wine. It is based on knowledge of grape and wine components and of transformation (fermentation). No other food product in the world has been subjected to as much scientific research. The work of oenological companies, which supply wine producers with additives and processing aids, is based on these advances in our understanding.

Oenological products are primarily used to prevent wine defects (oxidation, bacterial contamination, tartaric precipitation, etc.) and correct balances in the event of unfavourable climate conditions, which vary from year to year. In these cases, producers seek to ensure the lowest possible impact (or even none at all) on their wine's taste. Oenological products help achieve balanced wine with a natural expression. Excessive use of these products can compromise this objective, especially by altering a wine's balance of flavours.

One role of oenology is to study the composition of wines and understand how treatment has an impact on them. Oenology forms the basis for rational use of inputs, which winemakers do not necessarily acquire by their own experience. The International Vine and Wine Organisation (OIV) has been carrying out this work since it was set up in 1924, when it was called the International Wine Office.

The OIV now brings together 46 member countries. The work of technical and scientific evaluation of oenological practices involves several hundred experts in oenology and viticulture from the 46 member countries.

The need for a single international oenological standard

The providers of oenological products need to rely on an unique international oenological standard for the following reasons :

- 2 of 5 bottles produced being exported today , it is essential for the oenological companies and their customers can implement oenological processes compatible with any country , the treatments being carried out often before the final destination of the wine is known by the producer. The existence of multiple standards leads to technical confusion and adverse regulatory uncertainty for companies.

- In the absence of food safety concerns (absence of ADI), any dose usage limits that may be established by a country must be fixed on the basis of oenological justifications and should be aligned with the OIV recommendations.

The International Code of Oenological Practices and the International Codex are the only existing international standards on wine established by the major countries involved in the Wine economy.

We believe that the OIV is the unique competent organization to set limits on the use of oenological products taking into consideration the diversity and regional particularities of wine producing countries of the member countries in both hemispheres. The limits applied by many countries in the world are already those proposed by the OIV.

Although we agree with the principle of the Recommendation 1, we think the proposed footnote should be revised so as to be more incitative as regards the reference to the OIV. Any country willing to impose some qualitative limits for wine additives should refer to the limits already fixed by the OIV.

INTERNATIONAL ORGANISATION OF VINE AND WINE (OIV)

This document does not commit Member States of the OIV, in the comments and views that they might provide or express separately

During the 47th Session of the Codex Committee on Food Additives (CCFA), the Committee agreed to establish an electronic Working Group (e-WG), to develop a discussion paper which would assist to analyse the specific provisions of food category 14.2.3 and its sub-categories case-by-case. The e-WG was composed by France (chair), Australia (co-chair), Argentina, Brazil, Canada, Chile, China, Czech Republic, European Union, Germany, Hungary, India, Italy, Japan, Kenya, Netherlands New Zealand, Peru, Poland, Portugal, Russia Federation, Slovak Republic, South Africa, Spain, Switzerland, United Kingdom, United States of America, CEFIC (European Chemical Industry Council), FIVS (International Federation of Wines and Spirits), ICGMA (International Council of Grocery Manufacturers Association), OENOPPIA (International Association of Oenological products Manufacturers and marketers) and OIV).

The International Organisation of Vine and Wine (OIV) has expressed interest in participating in this eWG and actively participated.

The OIV would like to thank France and Australia for preparing this document CX/FA 16/48/13 which compiles all outstanding approaches of members of the eWG.

By the Agreement of 3 April 2001¹, the OIV is established as *“intergovernmental organisation of a scientific and technical nature of recognised competence for its work concerning vines, wine, wine-based beverages, grapes, raisins and other vine products.”* Its activities concern notably *“conditions for grape production and the oenological practices”*.

The objective of oenological practices include ensuring the wine is safe for human consumption and the conservation of the wine to permit consumption in good condition. Recent progress in chemistry has made possible the development of a group of treatments and practices, which, although they still aim at the preservation of wine, also seek to make up for its faults or to improve its qualities.

At international level, the O.I.V. assisted with meeting the above objectives by creating in 1970 a Code of “technological treatment of products of the vine” which was revised in 1977 as the International Code of Oenological Practices².

Meanwhile, the number of producer countries increased and different ideas of wine appeared in the world, that is to say different definitions notably of authorizable oenological practices.

In most countries, these practices are regulated by reference to a positive list of additives and processing aids and in some countries of practices. These positive lists are generally set according to the production practices dictated by the legal, cultural and climatic (terroir) nature of the country. Differing regulations have the potential to create technical barriers to trade and may lead disputes. Therefore, the international standardization of oenological practices through harmonization relying on scientific bases as well as on other legitimate factors, or systems of mutual recognition or equivalence is desirable.

¹ Agreement of 3 April 2001 establishing the International Organisation of Vine and Wine
<http://www.oiv.int/oiv/info/entextesfondamentaux>

² OIV International Code of Oenological Practices Ed. 2016 <http://www.oiv.int/oiv/info/enpublicationoiv#code>

As a matter of consistency, it is important for the OIV that the Codex General Standard for Food Additives (GSFA) includes commonly used wine additives so as not to restrict trade among all countries, whether they produce wine or not. If the GSFA is not updated, it could become an inadvertent barrier to trade by not listing legitimately used wine additives already approved in a number of producing countries and widely traded amongst them.³

In addition, in 2010, the OIV member-States have adopted the definition of « terroir »⁴ in which “*terroir*” is a concept which refers to an area in which collective knowledge of the interactions between the identifiable physical and biological environment and **applied vitivinicultural practices** develops, providing distinctive characteristics for the products originating from this area”.

Again, this concept gives the wine a **particular identity** unique to each terroir, which requires different oenological practices, including using different types and concentrations of additives.

Today, Its 46 Member States account for more than 85% of global wine production and nearly 80% of world consumption.

The international trade of grapes, wine and spirituous beverages continues to grow. The share of export volumes of wine has developed significantly over the past decade: at over 100 million hectolitres, it is equivalent to 43% of world consumption, compared with 25% 10 years ago. Every two bottles out of five consumed in the world are imported.

In the context of this globalisation of trade, where there is increasing competition between countries, the OIV defines the characteristics of vitivinicultural products and their specifications, and contributes to the promotion of good regulatory practices in order to ensure fair trade, as well as the integrity and sustainability of different viticultural products on the global market. The OIV contributes to the harmonisation and definition of new international standards in order to improve conditions for producing and marketing vitivinicultural products.

The OIV ensures a balance between traditional winemaking and innovation

In this framework,

1. The OIV considers that

- ✓ A list of authorized additives established by the GSFA should take into account the recommendations of international organizations, such as the OIV.
- ✓ OIV Member States have incorporated in the OIV 2015 work program "a collaboration with the Codex Alimentarius continued especially with the initiation of discussions to eventually lead to a cooperation protocol"⁵.
- ✓ The works of the Joint FAO/WHO Expert Committee on Food Additives (JECFA) should be taking into account regarding the safety assessment of food additives and the specifications for those additives.
- ✓ the OIV International Code of Oenological Practices gives recommendations for the quantity of additive to be added to wine, which is limited to the lowest possible level necessary to accomplish its desired effect,
- ✓ Regarding the numerical use level of these additives, the OIV “International Code of Oenological Practices” could be referenced on what concentration of an additive may be considered as GMP.

2. The OIV understands that there was a difference of opinion on whether the CCFA should recommend maximum levels of use that are numerical or are consistent with GMP.

3. The OIV supports, in the spirit of compromise, the idea to set the limit on wine additives at GMP with a footnote in the GSFA that refers to internationally recognised expert bodies that provide guidance on good manufacturing practice in wine production as suggested in Recommendation 1.

4. The OIV recommends that international recognised bodies, to be referred in the footnote according Recommendation 1, must be representative, impartial and transparent, with scientific and technical nature.

5. The OIV recalls that

³ During the 31st Session, the Codex Committee on Food Additives and Contaminants has indicated in its report that “*The Committee noted the necessity for the GSFA to be consistent with the OIV standards for wine*”. Report of the 31st Session, the Codex Committee on Food Additives and Contaminants 1999 p6
<http://www.codexalimentarius.org/download/report/25/AI9912ae.pdf>

⁴ Resolution OIV/VITI 333-2010 : Definition of Vitivinicultural “terroir” <http://www.oiv.int/oiv/info/enresolution>

⁵ OIV 2015 Annual work program <http://www.oiv.int/oiv/info/enplanstrategique>

- ✓ OIV is an **intergovernmental organisation of a scientific and technical nature** of recognised competence for its work concerning vines, wine, wine-based beverages, grapes, raisins and other vine products.”
- ✓ the recommendations adopted by the OIV Members-states are **based on scientific evidence** resulting from the work of a thousand or so **experts appointed by Member States**, who meet regularly as part of the OIV’s specialised scientific structures in viticulture, oenology, methods of analysis, economy, law, safety, health and grapes.
- ✓ Any international non-governmental organisation or stakeholders with an interest in vines, wine, table grapes, raisins and/or products of same, with an OIV **Observers** status⁶, **can participate and intervene** in the works of the Commissions, Sub-Commissions and groups of experts. It is the case, for example, for FIVS and Oenoppia who participate actively to the works of the OIV.
- ✓ The technical **decisions are taken by consensus** of the OIV Members-states, according to an **8-steps procedure comparable to the Codex Alimentarius**, give to the OIV a **technical and scientific references** accepted by its Member States as well as a **transparent functioning**.
- ✓ The OIV makes its publications, standards, congress proceedings and overview of collective expertise **freely and publicly available**
- ✓ All OIV recommendations are either **frequently included in national and regional regulations** or used as **reference** in the **bilateral, multilateral agreements**⁷⁸⁹
- ✓ OIV has the **same principles of membership** that form the basis of membership in the Codex Alimentarius Commission **and equivalent principles of standards-setting**¹⁰

Regarding recommendation 2

The OIV strongly supports the recommendation 2 if a footnote is adopted. In this case the provisions for 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), Sodium carboxymethylcellulose (INS 466) with the relevant technological function should be adopted at GMP with the footnote.

⁶ OIV Observers: [AIDV](#) - International Wine Law Association, [Amorim](#) Academy, [AREV](#) - Assembly of Wine-Producing European Regions, [AUIV](#) - International University Association of Wine, [CERVIM](#) - Centre for Research, Environmental Sustainability and Advancement of Mountain Viticulture, [FIVS](#) - International Federation of Wines and Spirits, [OENOPPIA](#) - Oenological Products and Practices International Association, [UIOE](#) - Union Internationale des Œnologues, [VINOFED](#) - World Federation of Major International Wine and Spirits Competitions, [ASI](#) - Association de la Sommellerie Internationale, [WIM](#) - Wine in Moderation

⁷ Bilateral Wine Agreement UE/South Africa <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:028:0003:0087:en:PDF>

⁸ Bilateral Wine Agreement UE/Australia http://eur-lex.europa.eu/legal-content/en/TXT/?uri=uriserv:OJ.L_.2002.028.01.0004.01.ENG

⁹ Reglamento vitivinícola del mercosur MERCOSUR/GMC/RES N° 45/96 http://www.mercosur.int/msweb/Normas/normas_web/Resoluciones/ES/Res_045_096_.PDF

¹⁰ 24th Codex Alimentarius Procedural Manual (2015) pp 217