

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 10

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-third Session

DISCUSSION PAPER ON THE USE OF CERTAIN FOOD ADDITIVES IN WINE PRODUCTION

(Comments of Argentina, Brazil, Burundi, Ecuador, Japan, Kenya, Russian Federation, South Africa, FIVS and OIV)

Argentina

Argentina agradece el esfuerzo realizado por Chile, los Estados Unidos y la Unión Europea en la elaboración del documento y la propuesta de nota revisada y agradece asimismo la posibilidad de realizar comentarios sobre el tema.

Al respecto, Argentina señala su posición en relación a los referidos documentos.

CX/FA 23/53/17

Recomendación 1:

C1: "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. Algunos miembros del Codex especifican además que la dosis máxima debe ser compatible con el Código de prácticas enológicas de la Organización Internacional de la Viña y el Vino (OIV).

C2: "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. Al definir las BPF, algunos miembros del Codex hacen referencia a las especificaciones del Código internacional de prácticas enológicas de la OIV.

Argentina podría aceptar en aras del consenso la opción C2

CX/FA 23/53/17 Add.1

- (i) **la nota revisada para ser aplicada a las recomendaciones 2 a 6 del documento CX/FA 23/53/17.**

"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. **Algunos Miembros del Codex especifican además el uso para ser consistente con el Código de Prácticas Enológicas de la Organización Internacional de la Viña y el Vino (OIV).**"

Atento la nota revisada, Argentina apoya la nueva propuesta presentada por los proponentes Chile, Estados Unidos y la Unión Europea y desea felicitarlos por haber arribado a esta solución de consenso que esperamos se cristalice en una decisiva acordada por todos los Miembros del Codex.

CX/FA 23/53/17

II) Tablas de aditivos Apoyar el avance al Paso 8 o 5/8 de los aditivos descritos en el documento CX/FA 23/53/17 para su adopción final.

Argentina apoya el avance en Trámite 8 o 5/8, según se sugiere, de los siguientes aditivos listados en el documento CX/23/53/17 para su incorporación a la categoría alimentos No. 14.2.3 Vinos de uva para su adopción final:

Recomendación 2: Ratificación por parte del CCFA de los aditivos para la categoría de alimentos N.º 14.2.3 Vinos de uva en la NGAA en el **trámite 5/8 (procedimiento acelerado)**, como se indica a continuación:

- ácido ascórbico,
 - ácido cítrico,
 - ácido fumárico,
 - goma arábiga,
 - ácido láctico (L-, D-, D),
 - carboximetilcelulosa,

Recomendación 3: Ratificación del CCFA del aditivo para la categoría de alimentos N.º 14.2.3 Vinos de uva en la NGAA en el **trámite 5/8**, como se indica a continuación
 - ácido eritórico,

Recomendación 4: Ratificación del CCFA del aditivo para la categoría de alimentos N.º 14.2.3 Vinos de uva en la NGAA en el **trámite 5/8**, como se indica a continuación
 - tartratos (INS 334; 335(i), (ii); 336(i), (ii); 337),

Recomendación 5: Ratificación del CCFA del aditivo para la categoría de alimentos N.º 14.2.3 Vinos de uva en la NGAA en el **trámite 5/8**, como se indica a continuación
 - ácido málico L-, DL-,
 - sulfato de calcio.

Recomendación 6: Ratificación del CCFA del aditivo para la categoría de alimentos N.º 14.2.3.3 Vino de uva enriquecido, vino de uva licoroso y vino de uva dulce en la NGAA en el **trámite 8** como se indica a continuación

Argentina está de acuerdo con las Recomendaciones 2 a 6 y apoya la adopción de los aditivos descritos en trámite 8 y 5/8 tal como se propone.

CX/FA 23/53/17 Add.1

(ii) Recomendación 2: Tablas de aditivos

Apoyar el avance al Paso 8 o 5/8 de los aditivos descritos en el documento CX/FA 23/53/17 para su adopción final.

Argentina reitera que apoya el avance en Trámite 8 o 5/8 de los siguientes aditivos listados en el documento CX/23/53/17 para su incorporación a la categoría alimentos No. 14.2.3 Vinos de uva para su adopción final de los aditivos listados.

Brazil

At CCFA52 (2021), Chile suggested that the CCFA resume the work on the use of food additives in the production of wine, highlighting the importance of harmonising international standards in this matter. CRD21 was introduced recalling that work on food additives in wines had been discontinued in CCFA49.

CCFA52 agreed to request Chile, as author, and the European Union and the United States, as co-authors, to prepare a discussion paper to further analyse the issue and to present specific recommendations.

Chile as author, the United States and the European Union as co-authors, based on what was concluded in CCFA52 paragraph 240 of REP21/FA and after due consideration of the intensive exchanges that took place on this matter since 2013, have developed recommendations to allow resumption of the work on the adoption of draft provisions on additives used in the production of grape wines.

Based on the notes proposed in the Discussion paper submitted under agenda item 5d in 2017, CCFA49, CX/FA 17/49/10, Recommendation 1, the following new notes were proposed:

C1: “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. **Some Codex Members further specify the maximum level to be consistent with the Code of Oenological Practice of the International Organisation of Vine and Wine (OIV).**

C2: “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. **When defining GMP, some Codex Members make reference to the specifications in the International Code of Oenological Practice of the OIV.**

Recommendation 2 proposed endorsement by CCFA of the additives for food category No. 14.2.3 Grape wines in the GSFA at step 5/8.

COMMENTS

Brazil agrees that it is important to have a follow up in the discussion on food additives for food category No. 14.2.3 Grape wines and to consider the provisions currently in the GSFA at step 5/8 for endorsement.

Brazil also recognizes the importance of OIV as a reference for vine and wine, as well as its experience and expertise in the theme. Additionally, we believe in the cooperation between Codex and OIV.

OIV was created in 1924 by six member states as a response to the international viticulture crisis. Since 2001, OIV operates under a renewed agreement, as 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.” Its activities concern notably “conditions for grape production and the oenological practices”. OIV, which represents 85% of the wine producing countries, provides an opportunity to assist in reducing apparent trade barriers that could result in absence of standards in this area.

However, it is also extremely important to point out the relevance of procedures standardized by CODEX Alimentarius and their compliance. In that way, considering that Section VII of Codex Procedural Manual describes the principles and guidelines for cooperation between Codex and other international organizations, we refer to paragraph 4: “Such cooperation may consist of:

- a) Cooperation at the initial drafting stages of a Codex standard or related text;
- b) Cooperation through mutual exchange of information and participation in meetings.”

OIV has, through the recent years, been contributing many times to develop the GSFA provisions in CCFA for food category No. 14.2.3. In this understanding, cooperation between Codex and OIV could be reinforced by following CODEX Procedural Manual and having the same or better results than the proposed notes C1 and C2.

This cooperation may include the organization’s participation in proposing a draft of a proposed standard or related text considering its competence and relevance in the subject. Either using, in whole or in part, a text developed by the organization as a basis for preparing a proposed draft standard or related text.

Wine is a complex product whose “value” needed preservation and protection through ethical use of food additives. The concern on the use of food additives in this product was not about safety but about the technological justification of the provisions.

In consequence, we believe the discussion of the specific provisions in Recommendations 2 to 6 (CX/FA 23/53/17) should be included in the mandate for the GSFA and OIV could be invited to propose a draft with the limits that are considered technologically justified to be reviewed by GSFA eWG.

Whilst respecting the importance and relevance of OIV and its contribution to a better provision of wine additives in Codex Alimentarius, in Brazil’s opinion, notes C1 and C2 represent an unnecessary precedent, with the mention that some Codex Members adopt a different approach from the standard and in consequence a real consensus could never be achieved, hence threatening one of CODEX strengths. In addition, we believe it is possible to take advantage of the expertise of OIV, with compliance to the Codex procedural manual without generating these unwanted precedents.

Brazil has the clarity that notes as proposed should be avoided as they do not contribute to reach consensus nor for greater acceptability of Codex Standards. Moreover, following CODEX procedures, it is possible to have an equal and broader representativeness.

The two proposed Notes C1 and C2 in CX/FA 23/53/17 are very similar with the Notes proposed in CCFA 49 which, even with a long and intense discussion, achieved no consensus among CODEX members.

CONCLUSION

The Brazilian delegation is in accordance with the additive’s provisions mentioned by the discussion paper and with the limits established by the International Code of Oenological Practices and proposes the following to go forward in the step process to be approved in GSFA:

Food Category No. 14.2.3 Grape Wines

Additive	INS	Max. Level (mg/kg)	Notes	INS Functional Class
ASCORBIC ACID, L-	300	250	AA	Acidity regulator, antioxidant, flour treatment agent, sequestrant
CITRIC ACID	330	1000	-	Acidity regulator, antioxidant, colour retention agent, sequestrant

FUMARIC ACID	297	600	EE	Acidity regulator
GUM ARABIC (ACACIA GUM)	414	300	-	Bulking agent, carrier, emulsifier, glazing agent, stabilizer, thickener
LACTIC ACID, L-, D- and DL-	270	4000	45, CC	Acidity regulator
SODIUM CARBOXYMETHYL CELLULOSE)	466	0,2	-	Bulking agent, emulsifier, firming agent, gelling agent, glazing agent, humectant, stabilizer, thickener
ERYTHORBIC ACID (ISOASCORBIC ACID)	315	250	AA	Antioxidant
TARTRATES	334, 335(ii), 337	4000	45, CC	INS 334 L(+)-Tartaric Acid: acidity regulator, emulsifying salt, flavour enhancer INS 335(ii) Sodium L(+)-tartrate acidity regulator, emulsifying salt, sequestrant, stabilizer INS 337 Potassium sodium L(+)-tartrate: acidity regulator, emulsifying salt, sequestrant, stabilizer
MALIC ACID, DL-	296	4000	45, CC	Acidity regulator, sequestrant
CALCIUM SULFATE	516	2000	BB	Acidity regulator, firming agent, flour treatment agent, sequestrant, stabilizer

Notes:

45 As tartaric acid

AA When the ascorbic acid has also been used on grape or must, the final concentration, in terms of ascorbic plus dehydroascorbic acid, shall not exceed 300 mg/kg

BB For use in liqueur wines only

CC Only when the initial acidity content is not raised by more than 54 meq/l (i.e. 4000 mg/kg as tartaric acid)

DD As residue level; added dose of calcium tartrate at 2000 mg/kg

EE For use to inhibit the malolactic fermentation.

Burundi

Discussion paper on the use of food additives in the production of wine: CX/FA 23/53/17

Comment: Burundi objects this proposal.

Justification: The proposal is not in line with the decision of CCEXEC 75 and CCEXEC 77 on the use of external resources in Codex and therefore seeks clarification on whether the decision applies to this case

Ecuador

1. Comentarios generales

Ecuador agradece la oportunidad de comentar el documento: CX/FA 23/53/17, y expresamos lo siguiente:

2. Comentarios específicos

- Sobre el documento CX/FA 23/53/17, Como Ecuador estamos de acuerdo con las recomendaciones dadas por Chile sobre el documento mencionado así como en el CRD21, en donde se plantea la importancia de retomar el examen de las recomendaciones para los aditivos en vinos, dado que la incorporación de nuevos aditivos en la NGAA, permitiría avanzar en la armonización de la normativa internacional en esta materia. Es relevante reafirmar la importancia de la ciencia en las normativas emanadas de los diferentes Comités del Codex, dado su rol de referente en materia de inocuidad, y otros fines como el de asegurar las prácticas de comercio equitativo entre los países, entregando una referencia internacional para la comercialización de alimentos.

Japan

JAPAN comments on the Discussion paper on the use of certain food additives in wine production (CX/FA 23/53/17 and CX/FA 23/53/17 Add.1)

Japan would like to submit the following comments on CX/FA 23/53/17 and CX/FA 23/53/17 Add.1.

JAPAN Comment on Recommendation (i) on CX/FA 23/53/17 Add.1

Codex standards should be developed and applied globally and should not be consistent with standards set up by certain organizations. Therefore, Japan would accept the notes only if the use of wine additives is not restricted by certain organizations.

Considering this point, Japan prefers the previous note designated as C2 in the document CX/FA 23/53/17, which makes reference to the Code of Oenological Practice of OIV, rather than C1 in the document CX/FA 23/53/17 and the revised note in the document CX/FA 23/53/17 Add.1, which specifies the maximum level / the use to be consistent with the Code of Oenological Practice of OIV.

JAPAN Comment on Recommendation (ii) on CX/FA 23/53/17 Add.1

In order to advance the step described in the document CX/FA 23/53/17, Japan supports notes only if the use of wine additives is not restricted by certain organizations.

Kenya

Discussion paper on the use of food additives in the production of wine: CX/FA 23/53/17

Comment: Kenya objects this proposal.

Justification: The proposal is not in line with the decision of CCEXEC 75 and CCEXEC 77 on the use external resources in Codex and therefore seeks clarification on whether the decision applies to this case.

Russian Federation

The Russian Federation does not support the continuation of the discussion on the use of food additives in grape wines, because this may mislead consumers about the quality of raw materials and finished wine and contribute to the wine adulteration.

South Africa

South Africa does not support any of the proposals presented in the discussion paper.

Rationale: There should be no reference to the OIV on the Codex footnote. Membership of OIV is limited and does not include all Codex members. To minimize the impact on trade in wine, there should be harmonization between Codex & the International Organisation for vine & wine (OIV), to ensure that there is no negative impact on the trade of wine. The levels set should be based on science.

FIVS (Fédération internationale des vins et spiritueux)

This paper presents the consensus view of the members of FIVS¹ regarding the Discussion paper on the use of food additives in the production of wine (CX/FA 23/53/17). The global value of the wine trade reached €34.3 billion in 2021.

FIVS is grateful to the governments of Chile, the United States and the European Union for their diligent work to find an agreement after several years of consultations. The resolution of this issue is of critical importance for international trade in wine. The Codex Alimentarius General Standard for Food Additives (GSFA) is the reference text on food additives around the world, in particular for emerging markets.

Currently, only five additives are recognised by the GSFA in winemaking, making the inclusion of other winemaking additives within the GSFA a matter of urgency for the global wine industry. As Codex Member States are announcing new measures for wine labels to carry ingredient lists it is critical that the work advances towards adoption. The absence of these substances from the Standard is already causing significant issues for the international trade in wine in several markets. Conclusion of this work will provide reassurances to the global wine industry, while giving regulators and consumers the ingredient information that they seek about the product.

FIVS strongly supports the adoption of either footnote, designated as C1 and C2, under Recommendation 1 (paragraph 11 of the discussion paper). Although worded slightly differently, both notes fully capture the spirit and complexity of the issue and would provide Member States the necessary flexibility.

FIVS strongly urges the members of the CCFA to adopt either options as-is, C1 or C2, during the meeting in Hong Kong to ensure the resolution of this critical issue for the international trade in wine.

OIV (International Organisation of Vine and Wine)

¹ FIVS is a global trade federation for the alcohol beverage industry since 1951. We are committed to providing a venue and developing tools to encourage social, environmental, and economic sustainability among our members and the wider sector, in keeping with the United Nations Sustainable Development Goals. Our membership includes producers, importers, exporters, and trade associations (currently accounting for 75% of the wine traded globally). We also welcome and collaborate effectively with affiliates from allied industries.

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

GENERAL COMMENTS

The 52th CCFA agreed to request Chile, the EU and the USA as co-authors, to prepare a discussion paper on the use of certain food additives in wine production which would be included on the agenda for CCFA53:²

The OIV would like to thank Chile, the European Union and the United States of America for preparing this document CX/FA 23/53/17 which compiles all outstanding approaches of the Codex members on this issue.

The wine making process and enological practices: a specific process

By the Agreement of 3 April 2001³, 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 includes ensuring the wine is safe for human consumption and the conservation of the wine to permit consumption in good condition.

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.

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.⁴

In addition, in some regulations or bilateral agreement it is stated in particular that good oenological practice should protect the authenticity of the product by safeguarding the concept that the typical features of the wine arise in the grapes harvested; takes into account the region of cultivation, and in particular, climatic, geological and other production conditions; is based on a reasonable technological or practical need to, among other things, enhance the keeping qualities, stability or consumer acceptance of the wine; and ensures that the processes or additions are limited to the minimum necessary to achieve the desired effect.

Moreover, the legitimate concerns of each government, when taking measurements, may vary. Thus, considering Good Manufacturing Practices (GMP), after taking into consideration these factors, it is quite possible that some regulations differ for the same additive.

In this framework,

1. The OIV considers that

- ✓ A list of authorized additives established by the GSFA shall take into account the recommendations of international organisations, such as the OIV.
- ✓ OIV Member States have incorporated in the OIV 2020-2024 strategic plan "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) shall be taking into account regarding the safety assessment of food additives and the specifications for those additives.

² REP 16/FA, para 97

³ Agreement of 3 April 2001 establishing the International Organisation of Vine and Wine <https://www.oiv.int/who-we-are/fundamental-texts>

⁴ 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>

⁵ OIV 2020-2024 Strategic Plan <https://www.oiv.int/who-we-are/strategy>

- ✓ 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.

4. **The OIV recalls that**

- ✓ 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**^{7,8,9}
- ✓ 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

SPECIFIC COMMENTS

Possible ways forward on a footnote associated with GMP

RECOMMENDATIONS INDICATED IN THE DOCUMENT CX/FA 23/53/17 ADD.1

Recommendation 1: 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:

PROPOSAL OF REVISED NOTE: “*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. Some Codex Members further specify the use to be consistent with the Code of Oenological Practice of the International Organisation of Vine and Wine (OIV.)*”

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/legal-content/en/TXT/?uri=uriserv:OJ.L_.2002.028.01.0004.01.ENG

⁸ Bilateral Wine Agreement UE/Australia <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:028:0003:0087:en:PDF>

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

1. The OIV supports the reference to the International Code of Oenological Practice of the OIV in the footnote since this is consistent with the reference to the International Code of Oenological Practice of the OIV made in the GSFA Food descriptors for wine grape (see note 86).
2. The OIV agrees to maintain in the first part of the note the text already agreed upon in the CCFA (i.e., the common part of options A and B of Recommendation 1 of CX/FA 17/49/10).
3. The OIV strongly supports this revised note as indicated in the document CX/FA 23/53/17 Add.1
4. The OIV draws the attention of the committee to the French translation of the note which does not exactly reflect the meaning of the English and Spanish versions. In the French version the wording of the second part of the note should read as follows

“..... Certains membres du Codex précisent en outre l'utilisation afin qu'elle soit conforme au Code des pratiques œnologiques de l'Organisation internationale de la vigne et du vin (OIV).”

RECOMMENDATIONS INDICATED IN THE DOCUMENT CX/FA 23/53/17

C1: “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. **Some Codex Members further specify the maximum level to be consistent with the Code of Oenological Practice of the International Organisation of Vine and Wine (OIV).**”

C2: “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. **When defining GMP, some Codex Members make reference to the specifications in the International Code of Oenological Practice of the OIV.**”

- **Regarding the proposal C1**, the OIV considers that this wording is clear as it takes into consideration the main aspects like the reference to “maximum level “ and the consistency with the OIV recommendations
- **Regarding the proposal C2**,

The OIV would like to mention that this version would be more open to interpretation.

1. **“When defining GMP;** GMP is already defined in section 3.3 of NGAA
2. **“Make reference to the specifications”** This is quite unclear. “make reference” is an open door to uncertainty. The OIV “specifications” are for oenological products and defined in the International oenological Codex. For the International Code of Oenological Practice, the conditions of use are “prescriptions”
3. **The reference of the OIV** should be indicated as in option C1 “.....in the International Code of Oenological Practice of the **International Organisation of Vine and Wine (OIV)**”

Recommendation 2: Endorsement by CCFA of the additives for food category No. 14.2.3 Grape wines in GSFA at step 5/8 as listed below:

Additive	INS	Step	Year	Max Level	Notes
ASCORBIC ACID, L-	300	5/8		GMP	New note
CITRIC ACID	330	5/8		GMP	New note
FUMARIC ACID	297	8		GMP	New note
GUM ARABIC (ACACIA GUM)	414	5/8		GMP	New note
LACTIC ACID, L-, D- and DL-	270	5/8		GMP	New note
SODIUM CARBOXYMETHYL CELLULOSE (CELLULOSE GUM)	466	5/8		GMP	New note

The OIV agrees on the proposal for adoption of these additives as GMP, pending agreement on an appropriate footnote with a reference to the OIV.

The OIV recalls that there is a maximal limit for citric acid in the final product at 1mg/L.

Recommendation 3: Endorsement by CCFA of the additives for food category No. 14.2.3 Grape wines in GSFA at step 5/8 as listed below

Additive	INS	Step	Year	Max Level	Notes
ERYTHORBIC ACID (ISOASCORBIC ACID)	315	5/8		GMP	New note

The OIV resolution Oeno 18/2000 modified by Oeno 4/2007 indicates that Isoascorbic acid, or D-ascorbic acid or erythorbic acid has the same antioxidant power as ascorbic acid and can be used for the same oenological purpose.

This acid exhibits the same appearance and the same solubility properties as ascorbic acid.

It is, optically, the reverse of ascorbic acid and has, under the same conditions, a specific rotatory power of:

20 °C

[α] between -20 and -21.5°

D

With the exception of rotatory power, this acid should exhibit the same properties as ascorbic acid, respond in the same way to the identifying reactions, and pass the same tests and responds to the same quantitative analysis.

Therefore, The OIV agree on the proposal for adoption of this additive as GMP, pending agreement on an appropriate footnote with a reference to the OIV.

Recommendation 4: Endorsement by CCFA of the additives for food category No. 14.2.3 Grape wines in GSFA at step 5/8 as listed below

Additive	INS	Step	Year	Max Level	Notes
TARTRATES	334; 335(i), (ii); 336(i), (ii); 337	5/8		GMP	128, New note

The current OIV limit (4 g/L) may be insufficient in extreme cases.

The OIV agree on the proposal for adoption of this additive as GMP, pending agreement on an appropriate footnote with a reference to the OIV.

22. **Recommendation 5:** Endorsement by CCFA of the additives for food category No. 14.2.3 Grape wines in GSFA at step 5/8 as listed below

Additive	INS	Step	Year	Max Level	Notes
MALIC ACID, DL-	296	5/8		GMP	New note, yyy

Note yyy: "including Malic acid L(-) (INS 296)"

The OIV admits the increasing of the titration acidity and the actual acidity (decreasing pH) by adding organic acids

Lactic acids, **L(-) or DL malic acid** and L(+) tartaric and citric acids are the only acids that can be used.

Actually, acids can be only be added to wine under condition that the initial acidity is not increased by more than 54 meq/l (i.e. 4 g/l expressed as tartaric acid).

The OIV agree on the proposal for adoption of this additive as GMP with the note yyy, pending agreement on an appropriate footnote with a reference to the OIV.

Recommendation 6: Endorsement by CCFA of the additive for the Food Category No. 14.2.3.3 Fortified grape wine, grape liquor wine, and sweet grape wine in the GSFA at step 8 as listed below

Additive	INS	Step	Year	Max Level	Notes
CALCIUM SULFATE	516	8		GMP	New note

The OIV agree on the proposal for adoption of this additive as GMP, pending agreement on an appropriate footnote with a reference to the OIV.

The addition of calcium sulfate could be allowed in liquor wine in order to

- Produce balanced liqueur wines from the gustatory point of view;
- Favour a good biological evolution and good maturation of liqueur wine;
- Remedy insufficient natural acidity of liqueur wines caused by: climatic conditions in the viticulture region, or oenological practices which lead to a decrease in natural acidity

The prescriptions state that

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- the use of calcium sulfate is used in combination with lower tartaric acid level
 - A calculation of the doses of calcium sulfate and tartaric acid needed to reduce the pH required should be performed
 - The dose must not exceed 3 g/L of calcium sulfate
 - The residual level of sulfate must not exceed the OIV limit
 - The practice should not be done to conceal fraud;
 - Chemical acidification and chemical de-acidification are mutually exclusive;
 - Calcium sulfate used must comply with the prescription of the International Oenological Codex standards