



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD ADDITIVES

Fifty-third Session

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

(Prepared by Chile, the United States, and the European Union)

BACKGROUND INFORMATION

1. CCFA45 (2013) agreed to establish an Electronic Working Group (EWG), led by France, open to all members and observers, and working in English only, to prepare recommendations on the horizontal approach for the use of food additives in these food categories with the technological function of “acidity regulator” and “emulsifier, stabilizer, thickener,” as well as recommendations on provisions and proposals for new provisions listed in food category 14.2.3 and its sub-categories in [CX/FA 13/45/12](#) and Appendices 2 and 3 of [CX/FA 13/45/7](#).
2. For CCFA46 (2014), the EWG prepared proposals for the horizontal approach for both “acidity regulators” and “emulsifiers, stabilizers, thickeners”, which were considered at the physical Working Group (PWG) on the GSFA at CCFA46. The PWG agreed to the recommendation that food additives with “acidity regulator” and “emulsifier, stabilizer and thickener” function should be considered on a case-by-case basis in food category 14.2.3 (Grape wines) and its sub-categories, and therefore, considered each provision in these food categories individually.
3. CCFA47 (2015) noted that the concern for specific provisions of food category 14.2.3 was not about the safety but rather on the technological justification of the provisions. CCFA47 agreed to establish an EWG, chaired by France and co-chaired by Australia, open to all members and observers, and working in English only, and which had the following objectives: (i) to 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, and (ii) to perform an examination on the effect of expressing a maximum use of additives in wine.
4. Considering the recommendation of the EWG to set the maximum use level of wine additives having ADIs “not specified” at Good Manufacturing Practice (GMP) with a proper footnote, CCFA48 (2016) generally agreed that “The maximum level of the additive in grape wine set as GMP 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. It was also agreed to pursue the work on the amendment of the GSFA with respect to food additives in wine.
5. At CCFA49 (2017), the European Union as Chair of the EWG co-chaired by Australia, presented the document ([CX/FA 17/49/10](#)) with recommendations for note texts to be related to food additive provisions belonging to the following functional classes: acidity regulators, stabilizers, and antioxidants in food category 14.2.3 (Grape wines) and its sub-categories. Due to a lack of consensus on the note text, CCFA49 agreed to discontinue further consideration of this item and the provisions for these additives would be held at the current Step, pending proposals from Members on how to advance work on these provisions.
6. At CCFA52 (2021), Chile suggested that the CCFA resume this work, 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.
7. 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. The discussion paper would be included in the programme for CCFA53.

## WORK DOCUMENT

8. 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 the following recommendations. Members and Observers are kindly invited to consider these recommendations with the view to allow resumption of the work on the adoption of draft provisions on additives used in the production of grape wines.

## RECOMMENDATIONS

9. The table below shows Recommendation 1 of the year 2017 that was presented at the CCFA49 meeting ([CX/FA 17/49/10](#)).

**Reference:** Discussion paper submitted under agenda item 5d in 2017, CCFA49, CX/FA 17/49/10<sup>1</sup>

**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 reference to one of the following footnotes:

**A:** *“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 and should be consistent with those of the International Organisation of Vine and Wine (OIV).”*

**B:** *“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. This maximum level may be further specified to be consistent with those of the International Organisation of Vine and Wine (OIV).”*

10. In view of developing a new formulation of the note, it is proposed to maintain 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](#)) and focus the discussions on aspects where consensus could not be reached (*i.e.*, the second part of options A and B).

11. In the text below, alternative notes for Recommendation 1 are proposed. These alternative notes arise from intense work throughout the year 2022, where Chile and the co-authors have discussed the best way to address this issue. In order to obtain a successful result in CCFA53 meeting, it is proposed to follow a similar approach to the one applied in previous cases (such as notes 477<sup>2</sup> and 478 for sweeteners in replacement of note 161) where the use of notes has allowed a consensus to be reached among the countries. The options for the notes are designated as C1 and C2. Codex Members are invited to consider and evaluate these two options with a view to developing a final note that ensures optimal information on the use of additives in wine by Codex Members.”

**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.”*

12. The application of alternative notes C1 and C2 to Recommendations 2 to 6 from [CX/FA 17/49/10](#) are discussed below:

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

<sup>1</sup> Discussion paper on the use of certain food additives in wine products, [CX/FA 17/49/10](#)

<sup>2</sup> Alternative Notes 477 and 478 were developed to replace Note 161 in the *General Standard for Food Additives* (GSFA): E.g., Note 477 reads ‘Some Codex Members allow to use additives with sweetener function in all foods within this Food Category while others limit additives with sweetener function to those foods with significant energy reduction or no added sugars.’

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

**Recommendation 3:** Endorsement by CCFA of the additive for food category No. 14.2.3 Grape wine in the 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

**Recommendation 4:** Endorsement by CCFA of the additive for food category No. 14.2.3 Grape wine in the 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	New note

**Recommendation 5:** Endorsement by CCFA of the additive for food category No. 14.2.3 Grape wine in the 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- "

**Recommendation 6:** Endorsement by CCFA of the additive for 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