

Consulting Feedback for Australian Grape and Wine Incorporated

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Q1

Milk and milk derivatives, egg and egg derivatives and plant proteins, specifically pea and potato proteins, are becoming more widely used globally as processing aids during wine production. As these materials can be considered foods we think they would be permitted under Chinese law despite not being listed as authorised processing aids for wine in GB 2760-2014. AGW would like to know the legislative basis for this permission. Could you identify the relevant legislation and provide an English translation?

A1

They can be used legally in food processing, but they are not regarded as processing aids. GB 2760-2014 has listed out all the permitted processing aids during the production of wine. These foods mentioned in above question are regarded as regular foods instead of processing aids, therefore they are not listed in GB 2760-2014 as processing aids in wine. Therefore, substances like pea and potato proteins, can be used in the wine production and they are regarded as regular foods rather than processing aids.

The Chinese competent authority had replied to similar questions before. The question raised was that whether the use of egg white powder as a clarifier in wine production falls under the category of food additive management. The official answer was that egg white powder belongs to regular food so it can be used in wine or fruit wine production, but was not regulated as a food additive. For the original reply letter, please refer to appendix 1.

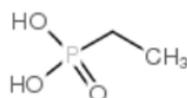
Q2

GB 2763-2019 permits the use of the fungicide Fosetyl-aluminium at 4.328. Would you be able to provide the chemical structures of the various components of the residue listed at 4.328.3? Could you also explain the meaning of a “temporary” maximum residue limit and what would need to be done in order for the limit to be permanent?

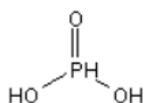
A2

The residue includes:

- 1) Ethylphosphonic acid (C₂H₇O₃P) and its relative salts
- 2) Phosphorous acid (H₃PO₃) and its relative salts



Ethylphosphonic acid (C₂H₇O₃P)



Phosphorous acid (H₃PO₃)

According to 4.328 in GB 2763-2019, the residue shall be calculated as ethyl phosphonic acid (C₂H₇O₃P).

According to Announcement No. 2308 of the Ministry of Agriculture of the People's Republic of China (MOA), MOA issued Guidelines for maximum residue limits of pesticides in food, and in the part 4 of this Guideline there is explanation of the temporary limit. The temporary limit is needed and set up when:

- 1) The allowable daily intake (ADI) is temporary
- 2) No complete or reliable dietary data
- 3) No standardized residue test method

- 4) Pesticide or the combination of pesticide and crop is not registered in China but there is trading demand and import testing needs
- 5) In case of emergency, when pesticides are approved for use on unregistered crops, emergency limit standards shall be formulated, and the scope and time of use shall be limited
- 6) Other information does not fully meet the requirements of the assessment process

A possible way to change its status from temporary to permanent is to collect all the available relevant study data and submit it to the standard draft team. Providing solid evidence can get you a chance to help change its temporary status when the draft team revise the next version of standard, but any potential change in standard need go through the review meeting organized by National Pesticide Residue Standard Review Committee.

Q3

When measuring the residual sugar levels in a wine for regulatory purposes do Chinese authorities accept the measurement of glucose plus fructose, or do they require the analysis of all reducing sugars including those that are not fermentable?

A3

According to GB 15037-2006, the total sugar shall be calculated as glucose, but to test the total sugar using the method of direct titration with film reagent (see part 4.2 of GB/T 15038-2006 Analytical methods of wine and fruit wine) means the analysis of all reducing sugars, not just the sum of glucose and fructose, but also maltose, lactose, galactose, ribose, deoxyribose, etc., therefore it actually includes those that are not fermentable.

Appendix 1

食品安全标准与监测评估司

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动态

卫生部办公厅关于蛋清粉使用问题的复函

former Ministry of Health 's reply to question regarding whey powder usage

发布时间：2012-03-15

中国食品工业协会：

你协会《关于蛋清粉作为澄清剂在葡萄酒生产中使用是否属于食品添加剂管理范畴的请示》收悉。经研究，现答复如下：

蛋清粉（蛋清蛋白粉，鸡蛋白粉）属于普通食品，可以在葡萄酒及果酒生产中使用，不作为食品添加剂管理。

专此函复。

二〇一二年三月十二日

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技术支持：国家卫生健康委员会统计信息中心

To China Food Industry Association:

We've received your "request for clarification on whether whey powder used as clarifying agent during grape wine production falls under the scope of food additive and is regulated as food additive". After analyzing, we reply as follows:

Whey powder (whey protein powder, egg protein powder) is regular food, it can be used in grape wine and fruit wine production, but it is not regulated as food additive.

We write this reply letter specifically to address your question.

Dated March 12, 2012.