OEnoppia

Oenological Products and Practices

International Association

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New regulations in organic winemaking: the commission's draft regulation.

Following the resumption of talks between the member states on the regulation project that aims at drafting terms of reference for organic winemaking, Oenoppia wishes to assert anew its 2010 positions. Oenoppia represents companies developing, producing and marketing winemaking products. These companies work in various fields, but all have in common to be involved in enological research and constantly care about matching winemaking practices with the very specific nature of wine. Oenoppia is an observer member of the International Organization of Wine and Vine (OIV).

Arbitrary exclusion of products

The establishment of a restricted list of ingredients for organic vinification is a guiding principle in accordance with articles 19 and 21 of EC regulation N° 834/2007. In accordance with this principle, the members of SCOF have been prompted to arbitrate on the scientific database provided by the Orwine task force, and to exclude a certain number of products and practices that figure in the EC regulation 606/2009. The quality and reliability of these data are not questioned. However, we would underline the fact that they cannot exhaustively cover the state of available and future knowledge, especially concerning oenological practices and products that have most recently been adopted under EC regulation 606/2009. The lack of data has consequently led to the exclusion of certain products that are not in contradiction with the principles stated in title II, nor with usage criteria expressed in article 21 of EC regulation 834/2007. **We consider some of these exclusions arbitrary because they are not justified from a technical point of view. These biases may constitute a barrier to the full completion of quality objectives in the organic wine production.**

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These arbitrary exclusion concern the following products, listed in Appendix I A of the (EC) 606/2009:

- **Mannoproteins**

Naturally present in wines at the end of alcoholic fermentation.

This practice consists in complementing the mannoproteins present in the end of fermentation to achieve a set of tartaric stability. They are derived from yeast in the same way as the yeast cell walls that are included in the restricted list. They offer an alternative to cold treatment which is a high energy consumer and metatartaric acid, only efficient in the short-run (from 6 to 18 months depending on the wine and the storage conditions). The works conducted by Orwine concluded to a favourable recommendation for mannoproteins, in the category of not mentioned products by private charters, being recently admitted as authorized practices. The mannoproteins have been developed by some Œnoppia's members through university research programs and **are not produced from genetically modified micro-organisms.**

- **Beta-glucanases**

Enzymes naturally present in grapes.

They are the only means for clarifying wines affected by Botrytis cinerea grey rot. Why would beta-glucanases be excluded whereas pectolytic enzymes remain in the restrictive list? They meet the same food safety and winemaking specifications needs and have no negative impact on wine. Besides they allow for an improved environmental impact as they ease filtration steps (reduced water and energy consumption, decrease significantly wine loses), or even eliminate them.

- **Lysozyme**

Enzyme that is present in wines following traditional egg white fining.

Lysozyme specifically inhibits lactic bacteria, to prevent lactic disease. It is interesting enological tool to reduce the SO2 doses required to stabilize wines microbiologically. In the frame of a global technical approach, it allows for a reduction of 20 to 30% of total dioxide in

the finished wines. With the trend of pH rise due to climate change, to exclude a tool for the microbiological stabilization of wines with a reduced SO2 content exposes them to an increased risk of non control of their quality. The allergen risks of the substance cannot constitute a factor of exclusion. The EU regulation 1266/2010 on labeling rules of wines includes the labeling of lysozyme from June 30th, 2012, on the same terms as casein included in the restrictive list of the organic wine regulation project.

Nota: United States authorized the use of lysozyme for the production of organic products (cf. *Federal Register / Vol. 71, No. 175 / Monday, September 11, 2006 / Rules and Regulations: National Organic Program (NOP); Amendments to the National List of Allowed and Prohibited Substances*).

These products, all derived from living organisms, conform entirely to the principles of the organic production regulation (EC) 834/2007 (article 4). We ask the commission and the member states to therefore accept the possibility of another assessment of these products by a panel of qualified experts in order to take into account their adequacy to the principles of organic production.

The evaluation of new oenological practices: field testing

The (EC) 834/2007 regulation does not provide the possibility to evaluate with field-testing new practices and/or ingredients, as it may be the case in winemaking. However, full-scale testing is a crucial factor to evaluate new oenological practices, allowing for the measurement of the substances impact on the finished wine. Article 4 of the 606/2009 regulation precisely defines the modalities for testing supervision (reporting mechanisms and volume limitations subject to derogation). Specific organic grapes physico-chemicals parameters and quality targets related to the respect of the natural quality of these grapes should require for any new practice to be tested in the cellar in the context of organic winemaking. For a competitive approach within the organic wine industry, also open to technical progress, these provisions concerning conventional wines should be applied in the frame of the organic wines regulation likewise.

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The use of organic-origin ingredients

Even though manufacturers devote significant effort to developing new ranges of organic inputs, it has to be said that some oenological products derived from organic products are not fully satisfying:

- Their availability remains not sufficient. This is the case in particular of yeasts, of which only a few strains of organic origin are available, according to the terms of reference of EU 1254/2008 regulation. The diversity of strains available in the wine yeast offer allows to provide answers to various oenological situations (alcohol rates, various grape varieties…) and to precise winemaking objectives (revealing varietal aroma, restarting stuck fermentations, …). Organic yeast strains do not meet this need for choice. It is also important to specify that all wine yeast strains proposed in Europe are selected on grapes and that **there is no offer of genetically modified yeasts in Europe for winemaking**.

- Their price is high (15% to 50% higher according to the ingredients) and could hinder the producers of organic wine.

- Their oenological properties can be irregular due to more difficult production and preservation conditions.

Besides, the notion of availability can be interpreted differently from one country to the other, leading to competition imbalance.

For those reasons, we support the notion of « preference » and not the notion of « availability».

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ANNEX

INFORMATION ABOUT EXPERIMENTATION MODALITIES IN EUROPEAN WINE REGULATION

(EC) 606/2009 extract

Article 4

Experimental use of new oenological practices

1. For experimental purposes as referred to in Article 29(2) of Regulation (EC) No 479/2008, each Member State may authorise the use of certain oenological practices or processes not provided for in that Regulation or in this Regulation, for a maximum of three years, on condition that:

(a) the practices and processes concerned meet the requirements of Articles 27(2) and 30(b) to (e) of Regulation (EC) No 479/2008;

(b) such practices and processes are applied to quantities not exceeding 50 000 hectolitres per year for any one experiment;

(c) the Member State concerned informs the Commission and the other Member States at the beginning of the experiment of the terms of each authorisation;

(d) the processes shall be entered on the accompanying document referred to in Article 112(1) and in the register referred to in Article 112(2) of Regulation (EC) No 479/2008.

'Experiment' shall mean an operation or operations carried out in the context of a well-defined research project with a single experimental protocol.

2. The products obtained by the experimental use of such practices and processes may be placed on the market of a Member State other than the Member State concerned provided the Member State authorising the experiment gives prior notification to the competent authorities of the Member State of destination of the terms of the authorisation and the quantities involved.

3. During the three months following the end of the period referred to in paragraph 1, the Member State concerned shall forward to the Commission a report on the authorised experiment and the results thereof. The Commission shall notify the other Member States of those results.

4. Depending on these results, the Member State concerned may apply to the Commission for authorisation to continue the experiment, possibly with a larger quantity than in the original experiment, for a further maximum period of three years. The Member State shall submit an appropriate dossier in support of its application. The Commission, in accordance with the procedure referred to in Article 113(2) of Regulation (EC) No 479/2008, shall decide on the application to continue the experiment.