



Distilled Spirits Aotearoa (NZ) Incorporated

New Zealand Business Number (NZBN): 9429047031708

Certificate of Incorporation: 2716891

Registered office: 71 Sandymount Rd, Sandymount, Dunedin, OTA 9077

Telephone: +64(0)22 305 6547 email: info@distilledspiritsaotearoa.org.nz

DistilledSpiritsAotearoa.org.nz

Via Consultation Hub (<https://consultations.foodstandards.gov.au/>)

To: submissions@foodstandards.gov.au

29 August 2024

DSA Submission on Application A1291 Glucoamylase from GM *Aspergillus niger*

Distilled Spirits Aotearoa is grateful for the opportunity to submit on the consultation: *Application A1291 Glucoamylase from GM *Aspergillus niger* (gene donor: *Gloeophyllum sepiarium*) as a processing aid*. This protein engineered variant of glucoamylase from genetically modified *Aspergillus niger* would be used as a processing aid in baking, brewing, distilled alcohol production and starch processing for the production of glucose syrups and other starch hydrolysates

About Distilled Spirits Aotearoa:

Distilled Spirits Aotearoa (DSA) currently represents 103 New Zealand distilleries, plus 19 pre-commercial distilleries expecting to start business in 2025/26. We estimate DSA membership coverage is 78% of the NZ spirits industry.

The New Zealand Distilled Spirits Industry:

The New Zealand spirits industry is made up of more than 150 distilleries, which employ approximately 910 jobs with an estimated \$41 million per year in wages. The industry is largely made up of small and medium family businesses, with over 65% located in rural and regional New Zealand.

The industry has a downstream economic value of \$16.8 million across other industries such as tourism, hospitality, research, agriculture, and manufacturing, providing approximately 1,547 downstream jobs. The New Zealand spirits' sector currently has an export value of \$45.8 million, with New Zealand-made spirits having the potential to match if not exceed the value of New Zealand's Wine Exports. Our distillers are recognised amongst the best in the world, bringing home prestigious awards such as the World's Best Gin at the International Wine and Spirits Competition on three different occasions.

Submission

DSA has previously submitted to FSANZ on the **Application A1271 (September 2023) Cellulase from GM *Aspergillus niger* as a processing aid**. Please contact info@distilledspiritsaotearoa.org.nz for a copy of this submission. Our position is unchanged:

DSA supports the use of any enzymes (eg. cellulase, proteinase, amylase, whether from GE or non-GE sources) to be used as a processing aid in brewing of beer and in distilled alcohol production, however

DSA does not support the use of any such enzymes in the production of spirits labelled as **New Zealand Single Malt Whisky**.

Background

It was agreed during the negotiations for the NZ-UK Free Trade Agreement, that Australia and NZ current definitions of whisky need to be strengthened to improve product authenticity and reduce counterfeits between the countries. FSANZ would facilitate an improved Food Standard for New Zealand and Australian whisky.

[UK-New Zealand FTA Chapter 7: Technical Barriers to Trade - GOV.UK \(www.gov.uk\)](#)

Chapter 7 Technical Barriers to Trade Annex 7A (Wine and Distilled Spirits)



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New Zealand shall support any good faith and complete application submitted by the United Kingdom, or any persons of the United Kingdom, that is consistent with the definition recognised in paragraph 1, to secure a standard for “whisky” or “whiskey” in accordance with the procedures for amendment of the Australia New Zealand Joint Food Standards Code as provided for in the Food Standards Australia New Zealand Act 1991, and elaborated on in the Application Handbook as amended from time to time. For greater certainty, New Zealand shall provide support throughout the application process, once the application has been submitted.

13. Nothing in this Section shall be construed as preventing New Zealand from requesting that Food Standards Australia New Zealand consider developing a standard for “whisky” or “whiskey” as defined in paragraph 1 in accordance with the procedures for amendment of the Australia New Zealand Joint Food Standards Code, as provided for in the Food Standards Australia New Zealand Act 1991, and elaborated on in the Application Handbook as amended from time to time.

In New Zealand, members of DSA and the New Zealand Whisky Association involved in whisky production have, by consensus, developed a comprehensive standard for Whisky producers in New Zealand. DSA formally accepted the [NZ Whisky Definition](#) into the DSA regulations in February 2021.

Whisky that is labelled as “**New Zealand Single Malt Whisky**” is very restrictive in the process that can be used in manufacturing. No additional enzymes may be added or used beyond what is already naturally occurring in the grain. The prohibition on the use of added enzymes is similar to the UK Government standard for **Scotch Whisky**: [TECHNICAL FILE FOR SCOTCH WHISKY](#) (publishing.service.gov.uk)

Whisky that is labelled as “**New Zealand Whisky**” has a broader scope of process limits, with enzymes able to be used to speed up the process and increase yield.

FSANZ Application A1271, and A1291 in the previous year, has highlighted the fact that many GE/non-GE enzymes could be used by distillers, unaware of the implications to their final product.

Product authenticity/ brand identity is a key priority for both DSA and the Australian Distillers Association. We encourage FSANZ and supporting branches of MPI to revive discussions on improved Standard(s) for all Australian and NZ whisky (and other distilled spirits).

Yours faithfully

Richard Wilson

Chair – Distilled Spirits Aotearoa (NZ) Inc