

Date

Mr. Gerald Isenberg
Director, Regulations and Procedures Division
Alcohol and Tobacco Tax and Trade Bureau
1310 "G" Street, NW
Washington, DC 20220

Dear Mr. Isenberg:

Under the provisions of section 27 CFR §24.249, *Experimentation with new treating material or process*, we request authorization to experiment using Chitosan of fungal origin for the removal of spoilage organisms such as *Brettanomyces* from wine. The fungal source of Chitosan is non-GMO *Aspergillus niger*. The typical levels of chitosan to be used are determined after a qualification test. The maximum dose level used will not exceed 10 grams of Chitosan per 100 liters of wine which is the same dosage limit allowed by the **COMMISSION REGULATION (EU) No 53/2011** Annex I A to Regulation (EC) No 606/2009. Please see sheet attached product sheet.

Chitosan is a linear polymer of D-glucosamine and N-acetyl-D-glucosamine (randomly distributed) and is the product of chitin desacetylation (hydrolyse of N-acetyl groups of chitin).

Fungal derived Chitosan has recorded GRAS documentation to the United States Food and Drug Administration (see GRAS Notice No. GRN 000397) for the use in wine production and received a response from the USFDA without question.

The experiment will occur on our winery premises and will be conducted separate and apart from other winery operations. Records of the experiment will be maintained, including the quantity of Chitosan use, the volume of wine treated and the disposition of the wine.

We wish to treat the following wine with 4 g/100 liter of Chitosan:

Kind of wine	gallons treated	proposed disposition of treated wine
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We will gladly provide samples of the wines both before and after treatment if desired by TTB.

If you have any questions or desire additional information, please let me know.

Sincerely,