Guidance title

Labelling Guide to Bottler’s details

Reviewed July 2019

Alternative formats

If you require this information in an alternative format such as audio, large print or Braille, please telephone the FSA Helpline on 020 7276 8829 or Email: helpline@food.gov.uk

For any technical queries relating to this guidance please contact your Regional Wine Inspector whose details can be found at https://www.food.gov.uk/business-guidance-uk-vineyard-register

Guidance prepared by
Wind Standards Inspection Team
Email: winestandards@food.gov.uk
Summary

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Revision History

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INTENDED AUDIENCE

2. Bottlers of wine sector products and those traders that commission bottling by third parties in the UK

PURPOSE OF GUIDANCE

3. These guidance notes have been produced to explain the legal requirements of Commission Regulation 2019/33 for still and sparkling wines. They cannot cover every situation and you may need to consider the relevant legislation itself to see how it applies in your circumstances. If you do follow the guidance notes they will help you to comply with the law. Businesses with specific queries may wish to seek the advice of their local Wine Standards Inspector.

https://www.food.gov.uk/business-guidance-uk-vineyard-register

LEGAL STATUS OF GUIDANCE

4. These guidance notes have been produced to explain the legal requirements for bottler details specified in Regulation 2019/33. If you follow the guidance notes they will help you to comply with the law.

NAME OF BOTTLER

5. The bottler is the natural or legal person or group of such persons carrying out bottling or having bottling carried out on their behalf who fills containers of less than 60 litres or commissions that filling. In the latter case, the wine must be owned by the company before commissioning the filling. The bottler's name may be that of a business (a limited company or otherwise) or that of a private individual.

However, the name given must be that of either an actual business or a real person actively trading; furthermore, except in specific cases approved by Wine Standards (WS), only one name can be used to identify the actual bottler associated with any one filling plant.

6. For wines imported in bulk from Third Countries and bottled in the EU the importer statement may be replaced or supplemented by the indication of the EU bottler. Alternatively, an importer code issued by Wine Standards can be utilised. These may be combined if the bottler is also the importer (see Example 3 below).
ADDRESS & MEMBER STATE

7. For wines bottled in the European Union the name and address of the bottler is a mandatory item of information which must be displayed in the same field of vision as other mandatory details. (See example 1)

8. The address shown must be the Head Office address of the bottler, with the address and United Kingdom (UK). Wine Standards considers the following format to be satisfactory “company name + local administrative area (e.g. postcode) + UK. Use of the full postal address is optional in addition to the postcode.

9. Where the bottling takes place neither at the commissioning bottler or in the immediate proximity then the address of the exact place where the operation took place and the actual bottler must also be shown. If the bottling takes place in another Member State, the name of that State must be shown together with the local administrative area (or zip / post code).

SIZE OF LETTERING

10. The size of the characters used for the bottler’s name, address and member state must be equal to or greater than 1,2 mm, regardless of the character format used. Where the name or the address of the bottler, producer, importer or vendor consists of or contains a protected designation of origin or geographical indication, the bottler statement shall appear on the label in characters which are no more than half the size of those used either for the protected designation of origin or geographical indications or for the designation of the category of the grapevine product concerned.

PREFIXES

11. The name and address of the bottler must be preceded by a word or phrase which identifies the company. This should be either "Bottler" or "Bottled by" or, for containers other than bottles, "Packager" or "Packaged by". Where the stated bottler did not actually fill the bottles but merely commissioned their filling, then the terms "Bottled for" or "Packaged for" should be used in addition to the actual bottler details. Where bottling takes place in another place than that of the bottler, the particulars referred to in this paragraph shall be accompanied by a reference to the exact place where the operation took place and, if it is carried out in another Member State, the name of that State. These requirements do not apply where bottling is carried out in a place of immediate proximity to that of the bottler.
These terms must appear in an official language of the Community. One of the above terms must precede the bottler's name (See example 2), unless a traditional term, indicating that the wine was bottled by the producer, is used. There are a considerable number of these; for example, 'Erzeugerabfüllung' and 'Mis en Bouteille au Chateau'. For further advice consult your local inspector.

**OFFICIAL CODES**

Details of the bottler, producer, importer and vendor may be replaced by a code determined by the Member State in which the head office is situated. The code shall be supplemented by a reference to the Member State in question. The name and address of another natural or legal person involved in the commercial distribution other than the bottler, producer, importer or vendor indicated by a code shall also appear on the wine label of the product concerned.

In the United Kingdom Wine Standards at the Food Standards Agency will issue official codes on written/email request and these codes (prefixed W) may be used to indicate the head office name and address of the bottler and/or importer.

Any company wishing to apply for an Official Code should contact their local wine Inspector.

12. **If the name of the bottler and/or importer appears in code**, the name and address of another person involved in the distribution of the product must be shown and be preceded by a phrase identifying their relationship to the wine e.g. 'Distributed by' or “Selected & distributed by – “(See Example 3).
EXAMPLES

1. ACTUAL BOTTLER (who owns the wine at time of bottling)
   a. EC wine
      “Bottler” or “Bottled by: XYZ Bottling Ltd, (full address optional)
      postcode, United Kingdom or UK

   IMPORTANT NOTE
   I. If the company bottles the wine at premises other than at their Head
      Office or in the immediate proximity the actual location of the bottling
      must be shown by adding “at postcode, United Kingdom, or UK”.

   b. Third Country wine
      “Importer and bottler” or “Imported and bottled by XYZ Bottling Ltd, (full
      address optional) postcode, United Kingdom or UK.”

      Also see Important note 1(a) above.

2. CONTRACT BOTTLER (The wine does not belong to the bottler / packer but
   the person commissioning the bottling,)
   a. EC wine
      (a) - “Bottled for (company name of owner of the wine, + Head Office
      (full address optional), postcode, United Kingdom or UK).   OR

      (b) – “Bottled for (company name of owner of wine + head office-(full
      address optional), postcode United Kingdom or UK, by........,(name of the
      actual Bottler and Head Office (full address optional), postcode, United
      Kingdom or UK”).

      Also see Important note 1 (a) above.

   b. Third Country wine
      For wines imported in bulk and bottled in the Union, the name of the importer may be
      replaced or supplemented by the indication of the bottler

      (a) - “Importer or Imported by PQR plc, (full address optional),
      postcode, United Kingdom (or UK)” and/or

      Bottler or Bottled by - Company name (full address optional), Postcode,
United Kingdom (or UK).

Also see Important note 1 (a) above.

(b) - If one company (XYZ) Ltd has imported the wine and sold it in bulk to another company (PQR Ltd) who in turn has asked a contract bottler to bottle it for him /her.

“Importer or Imported by XYZ Ltd (full address optional), postcode, United Kingdom or UK and bottled for PQR Ltd (full address optional), postcode, United Kingdom (or UK)…”

followed either by A Bottler Ltd (full address optional), postcode, United Kingdom or UK”.

Or at plus actual address”

In this scenario it may also be possible to use bottler and importer codes or the EU the importer statement may be replaced or supplemented by the indication of the EU bottler

Also see Important note 1 (a) above.

(c) - If the same company imports and bottles the wine -

“Importer or Imported and bottled by XYZ Ltd (full address optional), postcode, United Kingdom or UK” or “Bottled by XYZ Ltd (full address optional), postcode, United Kingdom or UK”

3. **IF BOTTLER / IMPORTER CODES ARE USED**

Reminder: Official codes can only be obtained from FSA Wine Standards and applications for codes should be made in writing or via email either directly to your Regional Wine Standards Inspector or to the FSA Wine Standards inbox

If codes are used, the name and address of another person involved in the distribution of the product must also be shown and be preceded by a phrase identifying their relationship to the wine e.g. 'Distributed by' or “Selected by “

a. EC Wine

“Bottler” or "Bottled by" W1068 UK

If codes are used then the person / company involved in the distribution must also be shown e.g. – “Distributed by ABC Ltd, (full address optional), postcode, United Kingdom (or UK).”
IMPORTANT NOTE

1(a) If the company W1068 bottles the wine at premises other than that of their Head Office the actual location of the bottling must be shown by adding

“at (full address optional) postcode, United Kingdom, or UK”.

b. Third Country wine

(a) “Imported by W1234, UK and bottled by W3456, UK “

(Note -two different companies involved). If codes are used then the person / company involved in the distribution must also be shown e.g. – “Distributed by ABC Ltd, (full address optional) postcode, United Kingdom (or UK)

Also see Important note 1 (a) above.

(b)- Imported and bottled by W 1234, UK (Note - same company doing both importing bulk and the bottling the wine) and Distributed by ABC Ltd, (full address optional) postcode, United Kingdom (or UK)

Also see Important note 1 (a) above.

REVIEW

13. This guidance will be reviewed in December 2021. In the meantime, if you wish to provide feedback, please email: winestandards@food.gov.uk