



Guidance title

Labelling still wine from Third Countries

Reviewed April 2016

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@foodstandards.gsi.gov.uk

For any technical queries relating to this guidance please contact your Regional Wine Inspector whose details can be found at

<http://www.food.gov.uk/business-industry/winestandards/contactinspectors>

If you have any comments on the guidance itself, please email

winestandards@foodstandards.gsi.gov.uk

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SUMMARY

Intended audience:	wine bottlers, importers and wholesalers
Which UK nations does this cover?	All UK countries.
Purpose:	Labelling provisions required under wine sector regulations
Legal status:	Regulatory guidance
Key words	Labelling, Wine, third country, third countries, importer
Review date	April 2018

This guidance follows the Government Code of Practice on Guidance. If you believe this guidance breaches the Code for any reason, please let us know by emailing betterregulation@foodstandards.gsi.gov.uk.

REVISION HISTORY

Revision No.	Revision date	Revision	Revised by
1	Apr 2013	Geographical Indications	John Boodle
2	October 2013	Allergens information Outline 7	John Boodle
3.	April 2016	Updated contact details Update to legislation Allergens update	Graham Finch

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INTENDED AUDIENCE

1. This information is intended for UK bottlers, wine importers and traders in the United Kingdom who market wines from Third Countries in the wholesale sector.

PURPOSE OF GUIDANCE

2. This guidance has been produced to set out the information which must be included, or may be shown on labels for wines produced outside the European Union.

LEGAL STATUS OF GUIDANCE

3. These guidance notes have been produced to explain the legal requirements of the relevant provisions of Regulation (EU) No: 1308/2013, Regulation (EU) No:1169/2011 and Regulation (EC) No: 607/2009. They cannot cover every situation and you may need to consider the relevant legislation itself to see how it applies in your circumstances.

It is recommended that you also read the guidance for labelling EU still wine as the basic requirements are almost identical.

If you follow the guidance notes they will help you to comply with the law.

ADDITIONAL ADVICE

4. Example label layouts are shown in the Appendix on pages 13 and 14. The layouts are only illustrative. Provided the compulsory and optional particulars are correctly displayed other label designs are permitted. Businesses with specific queries may wish to seek the advice of their local Wine Standards Inspector.

Our Inspectors will be happy to advise you free of charge as to whether your label complies with the regulations. Although we respond to enquiries as quickly as we can please allow at least 20 working days for feedback on your label design.

COMPULSORY LABELLING INFORMATION

Outline requirements

The following compulsory details must appear on wine labels:-

1. A statement of provenance i.e. Wine / Country of Origin
2. Category of product – usually “Wine” for still wines.
3. The EU importer details*
4. The Bottler* or packager details if the product is bottled or packed in the EU.
5. The nominal volume
6. Actual alcoholic strength
7. An allergens statement*
8. A Lot number*

* The asterisked items are not required to be in the same field of vision as the other compulsory particulars so may appear on a different label. However, importer and if needed the EU bottler details must be shown together.

Display of Compulsory Information

The compulsory particulars must be in indelible type and must be clearly separate and distinguishable from all other graphics and text. Technically all of the mandatory information should run horizontally but information shown vertically around the label may be accepted if it can be clearly read without actually having to turn or rotate the bottle.

Further details

1. Provenance statement (Wine/Country of origin)

The regulations require a clear statement of "provenance" in one of the following formats

1. Wine of [country]
2. [Country] wine
2. Product of [country] or
3. Produced in [country]

Blended wines

Wines which are obtained by blending wines from different third countries must be described as

- 'Blend of wines from [stating countries]'
- 'Blend of wines from different countries outside the European Community'
- "Blend from ...

Blended wines from separate countries would not normally be able to show a vine variety or vintage unless the two third countries concerned had established a joint varietal wine certification system.

2. Importer details

The importer is defined as the individual or company who is responsible for bringing the wine into circulation within the EU. This does not mean the transporting company or an intermediary agent but essentially, the owner and onward distributor of the wine when it first enters the EU. The importer is legally responsible for the quality, authenticity and correct labelling of the product and for ensuring all relevant accompanying documentation is provided.

The importer can be an individual or a company but either way their details must be clearly shown on the label to enable traceability of the product. The importer may be based anywhere within the EU but for UK importers their details would be indicated by:-

"Importer or Imported by ABC Ltd (address), postcode, United Kingdom (or UK)"

3. Bottler's (filler\packager) and Importer details

Where a product is imported in bulk and bottled or packaged within the EU then the actual bottler details, including the location of bottling, must be shown on the label.

For bottlers or fillers who actually import the wine themselves and bottle or fill directly at their own head office premises the expression used would normally be:-

“Imported and bottled by [name] [postcode] United Kingdom (or UK)”

If the bottling or filling takes place elsewhere at another of the company’s own premises the expression would need to include the head office address and the location of the bottling plant.

“Imported and bottled by [name] [postcode] United Kingdom (or UK) at [postcode] United Kingdom (or UK)”

Importing and/or Contract bottling

In some cases the importer of the wine may sell the wine to another trader prior to bottling and/or may arrange for it to be bottled by a third party contract bottler. It is necessary to indicate:-

1. The importer details
2. the bottler details and
3. the location of bottling if this is not at the bottler’s head office address.

So for example, in the case of company ABC Ltd arranging for another company to bottle their wine, the expression would be:

“Imported by ABC Ltd (address), postcode, United Kingdom (or UK)”

“Bottled for ABC Ltd, (address),postcode, UK) (optionally “by” the name of bottler) “at” (bottler’s administrative address or their postcode UK)”.

Official codes

As can be seen, trying to display both the importer and bottling details, especially for contract bottling, can be rather cumbersome and therefore the rules allow for the details to be replaced, in certain circumstances, by an official code issued by the Wine Standards team, provided the name and address of a distributor is also shown on the label.

Any companies wishing to apply for an official importer or bottler code should contact their Regional Inspector. Further more detailed guidance on bottling expressions and about the use of official codes is available here

<http://www.food.gov.uk/sites/default/files/multimedia/pdfs/enforcement/bottlersguide.pdf>

4. **Nominal Volume expression**

This must be shown in litres, centilitres or millilitres and expressed in figures e.g. 75cl, 375ml.

The minimum height requirements are shown below but generally Local Authority Trading Standards Departments are responsible for Weights and Measures (Packaged Goods) enforcement and guidance.

Container Volume	Height
20cl or less	3mm
22 cl - 100cl	4mm
100cl or more	6mm

5. **Alcoholic strength**

The alcoholic strength or “abv” must be shown as whole or half units e.g. XX% vol. or XX.5% vol.

The statement may be preceded by either ‘Actual Alcoholic strength’ or Actual alcohol’ or ‘Alc.’ The size of the statement depends on the size of the container volume as indicated below.

Container volume	Height
20cl or less	2mm
20cl – 100cl	3mm
100 cl or more	5mm

There are exceptions for Australian, Swiss and Canadian wine where the abv may be shown in 0.1% increments.

The actual alcoholic strength of the wine must be within 0.5% tolerance of the figure shown on the label except for Australian wine which may legally vary by 0.8%.

6. **Allergens Statement**

The display of allergenic ingredients is required by EU Regulation (EU) No:1169/2011 (which has been implemented in the UK by the Food Information Regulations 2014) and also by EU wine labelling regulation (EC) No: 607\2009.

The allergens statement, which must be in English or USA English, is required if the Sulphur Dioxide level exceeds 10mg/l and/or if milk or egg residues in the wine exceed 0.25mg/l. For wine, the regulations require the statement to be in the format

“Contains [name of allergen]”.

The statement must be clearly legible and must be at least 1.2 mm high based on the lower case of the letter "x" of the font being used.

Further guidance on allergens is available on the Food Standards Agency web pages at

<http://www.food.gov.uk/sites/default/files/multimedia/pdfs/enforcement/wineallergenlabeloct13.pdf>

<http://www.food.gov.uk/policy-advice/allergyintol/label/> |

See also item 14 in Optional Items regarding additional permitted symbols.

7. Lot numbers

A Lot number indicating when the batch in question was produced must be shown on the label. This is to enable traceability and to allow, in the case of a serious problem occurring, for only affected batches of the product to be withdrawn from sale.

This lot number is usually prefixed with “L” followed by numbers indicating the date and time of production. Although the wine regulations require a lot number to be shown the format for the number itself is the responsibility of Local Authority Trading Standards Departments.

Optional Items

Any optional information shown on a label, including within the descriptive text, must not mislead or confuse the consumer as to the true provenance or quality of the product. This includes the overall presentation of the product. In particular labels must not refer to EU protected designations of origin or protected geographical indications or protected traditional terms.

Labels must not state that the product is “similar to” “like” “in the style of” “made like” etc. and cite the name of another PDO, PGI or protected expression. In certain cases this extends to company names, brand names and trademarks. This also applies to the use of certain grape variety names. Lists of protected grape variety names are contained in Annex XV of Regulation 607/2009.

Some third countries with bilateral agreements with the EU may be permitted to use certain protected traditional terms if allowed for in the agreement.

Details of Protected Designations of Origin and Protected Geographical Indications and protected traditional terms are shown on the EU e-bacchus website

<http://ec.europa.eu/agriculture/markets/wine/e-bacchus/>

8. **Vine variety**

A vine variety may only be shown on a third country wine which is either:-

1. from an official geographical region which must be shown on both the accompanying VI1 document for the wine and on the label or
2. a certified Varietal wine as indicated on the VI document

Unless otherwise allowed for in any bilateral agreement, where one variety is shown, the wine must contain at least 85% of the named variety. Where two or more varieties are shown the wine must only contain those varieties and they must be shown in descending order.

The names used must be the correct name or the approved synonym for the variety. The “List of international vine varieties and their synonyms” is published by the Office International du Vin (OIV) see <http://www.oiv.int/oiv/info/enpublicationoiv>

9. **Vintage**

A vintage may only be shown in circumstances shown in paragraph 8 above. Unless otherwise provided for in any bilateral agreement the wine must contain at least 85% of the named vintage.

10. **Residual sugar level**

The terms which must be used, including *dry*, *medium dry*, *medium*, *medium sweet*, *sweet*, to indicate a specified range of residual sugar in grams per litre are set out in Regulation E C 607/2009 Annex XIV

11. **Traditional terms “methods of production”**

Traditional terms, including certain vineyard terms, may be used only if the wine meets the relevant definitions. Some terms are protected only for use by specific EU Member

States who have registered the terms with the Commission. These are listed on the EU e-Bacchus website

<http://ec.europa.eu/agriculture/markets/wine/e-bacchus/>

Examples include “Chateau” (France and Luxembourg), “Reserva” (Spain and Portugal) and “Gran Reserva” (Spain).

However, some third countries with bilateral agreements with the EU may be allowed to use some of the terms in certain cases. See also 12 below regarding terms as part of trademarks

12. Use of Trademarks

Trademarks must not conflict with Protected Designations of Origin, Protected Geographical Indications or other protected traditional terms, However, there are exemptions for terms which were in use and which were registered within the EU before the 4th May 2002. Further details are in Article 41 of Regulation EC 607/2009.

14. Community symbols

Symbols cannot be used to replace compulsory information such as allergens warnings. However, a symbol authorised by the EC may be used in addition to the display of the required information.

The following symbols to highlight the presence of allergens are approved for use and appear in Regulation (EU) No 579/2012

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:171:0004:0007:EN:PDF>



REFERENCES

eBacchus website for protected geographical regions and traditional terms

<http://ec.europa.eu/agriculture/markets/wine/e-bacchus/index.cfm?event=pwelcome&language=EN>

Council Regulation (EU) No: 1308/2013
Commission Regulation (EC) No: 607/2009
Council Regulation (EU) 1169/2011

REVIEW

The guidance will be reviewed in April 2018. If you wish to give comments on this guidance please email winestandards@foodstandards.gsi.gov.uk

APPENDIX

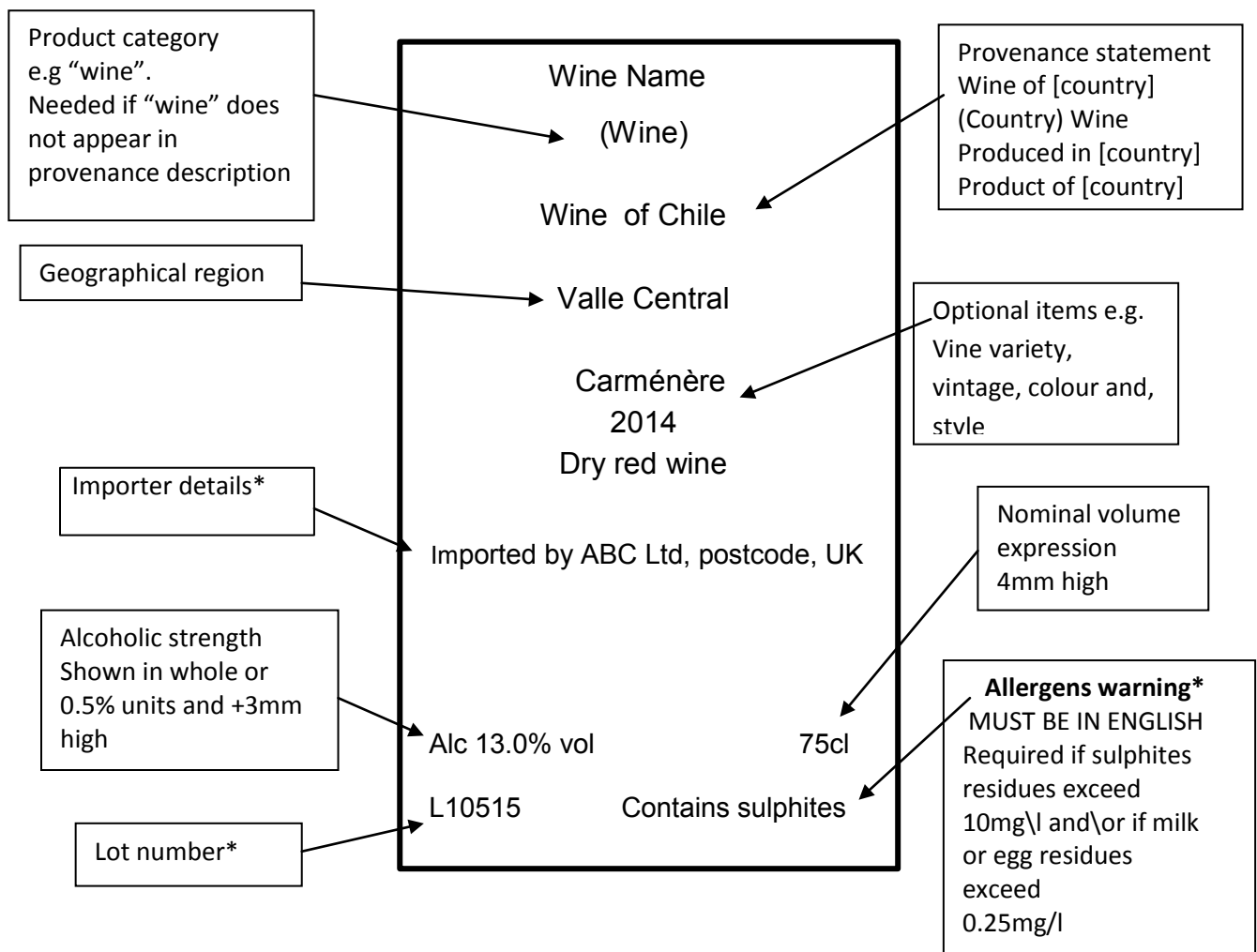
Third country label examples

Note : All compulsory particulars must be presented in indelible characters and must be clearly distinguishable from surrounding text or graphics. Unless otherwise indicated all compulsory particulars must appear in the same field of vision in such a way as to be simultaneously readable without having to turn the container

* Items marked with an asterisk are compulsory items that can appear on a different label.

The following layouts are only illustrative. Provided the compulsory and optional particulars are correctly displayed other label designs are permitted. Our Inspectors will be happy to advise you free of charge as to whether your label complies with the regulations. Please allow at least 20 working days for feedback on your label design.

For wine with a Geographical Indication



Wine without geographical indication

