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## Allergens Labelling for Wine

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Reviewed April 2016

### Alternative formats

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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>

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## Summary

<b>Intended audience:</b>	Bottlers, shippers, importers, wholesalers and UK producers
<b>Which UK nations does this cover?</b>	All UK countries
<b>Purpose:</b>	Guidance on labelling sulphur dioxide, and milk and egg fining agents which are allergenic.
<b>Legal status:</b>	Regulatory guidance
<b>Key words</b>	Wine, labelling, allergens, milk, eggs. sulphites
<b>Review date</b>	April 2018

## Revision history

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](mailto:betterregulation@foodstandards.gsi.gov.uk).

If you have any comments on the guidance itself please email them to [winestandards@foodstandards.gsi.gov.uk](mailto:winestandards@foodstandards.gsi.gov.uk)

<b>Revision No.</b>	<b>Revision date</b>	<b>Purpose of revision and paragraph number</b>	<b>Revised by</b>
1.	Nov 2013	Ingredients list	John Boodle
2.	April 2016	Updated contact details Update to legislation including a minimum height requirement for allergens warnings Update to text	Graham Finch

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## INTENDED AUDIENCE

1. The guidance is for UK bottlers, shippers, importers, wholesalers and producers

## PURPOSE OF GUIDANCE

2. This guidance has been produced to ensure that wine traders are aware of their legal obligations with regard to allergens labelling and thereby to ensure the safety of consumers of wine.

Wines from the 2012 vintage onwards which are produced using egg or milk as fining agents must state an allergens warning on the label if residues exceed 0.25mg/l.

All wines labelled after November 2005 with a total Sulphur dioxide level of 10mg/litre or more must state an allergens warning on the label.

## LEGAL STATUS OF GUIDANCE

3. These guidance notes have been produced to provide advice on the legal requirements of the wine labelling regulation (EC) No: 607/2009 and the EU Food Information for Consumers Regulations (EU) No: 1169/2011 in relation to the allergens labelling requirements for wine.
4. The notes cannot cover every situation and you may need to consider the relevant legislation itself to see how it applies in your circumstances. If you follow the guidance it will help you to comply with the law. Businesses with specific queries may wish to seek the advice of their Regional Wine Inspector whose details can be found at

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

## EUROPEAN COMMISSION AND UK LEGISLATION

5. Normally wine products are marketed and labelled in accordance with specific wine regulations, as wine falls under a different marketing regime to general food products. However, the labelling of wine has also become subject to certain “horizontal rules” in respect of food safety matters such as allergens warnings.
6. Allergen labelling for wine was made compulsory from 25 November 2005. However, at that point it was only necessary to indicate a warning for Sulphur Dioxide\Sulphites. The threshold for declaration was and remains 10mg/l.

7. In 2007 the European Commission introduced Directive 2007/68 which added further allergenic ingredients to the labelling requirements. As a result, in June 2012, following lengthy objections from the industry, it became compulsory to also declare the presence of milk and/or egg residues in wine if they exceeded the prescribed level. The prescribed level is currently 0.25mg/l.
8. In 2011 the EU introduced regulation (EU) No:1169/2011 which contained a range of provisions for the labelling of all food products. These included ingredient listings, nutritional information and allergens warnings. These regulations were implemented in the UK by The Food Information Regulations 2014 (FIR). Generally speaking these regulations require any allergenic substances in food to be highlighted within an ingredients' listing.
9. However, the regulations specifically exempt wine (and other alcoholic beverages above 1.2% abv) from the need to show nutritional information or an ingredients listing. The regulations still require an allergens warning to be shown if the specified allergenic ingredients are present above the prescribed limits. In such cases the regulations require allergenic ingredients to be shown in the format of:

“Contains -- followed by the name of the allergen”

This requirement is the same as that within the wine labelling regulations (EC) No: 607/2009.

10. However, the new regulations have now introduced **a minimum size** for the allergen warning. The warning must be clearly legible and be at least 1.2 mm high based on the lower case “x” of the font being used. See the diagram on page 7.
11. All allergens warnings must be shown in English or American English although other languages may be shown in addition to the English statement to facilitate community trade.
12. Use of “voluntary” Ingredients Lists

Although, as mentioned previously, wine is exempt from showing a list of ingredients, some traders wish to use a voluntary ingredients listing so as to present a consistent approach to marketing the food they sell. Generally, provided the allergen and the word “contains” clearly appears this may be acceptable, although ideally the “Contains [allergen]” format required by the regulations should be observed. Traders wishing to adopt an ingredients listing approach should discuss the proposed label

layout with their Regional Wine Inspector.

### 13. “No added Sulphur” and “Sulphite free” statements

Some wine producers incorrectly assume, because they have not used Sulphur Dioxide or other Sulphur treatments during the production of their wine, that the finished product does not need to display an allergens warning.

Sulphites are produced naturally during the normal fermentation process so, even if sulphur has not been added, it is still likely that residual levels of sulphites will exceed the 10mg/l declaration threshold. We do not believe that any wine can be correctly described as ‘sulphite free’.

Inspectors will therefore assume that all wines will contain in excess of the declaration level and that the allergens warning should be displayed on the label.

To reduce the risk of movement controls being applied to consignments of wine, producers and distributors of wines making these sorts of statements, and not displaying an allergens warning on the label, are strongly advised to provide copies of the analysis relating to the specific batch of wine in question (along with the other compulsory accompanying documentation), to prove that the levels of sulphites are below the legal declaration threshold.

### 14. Use of voluntary symbols or pictograms

At the moment the law requires written warning statements to be displayed. If desired an approved pictogram\symbol, shown below, to highlight the presence of allergens may be used in addition to the written warning. The symbols appear in Regulation (EU) No: 579/2012

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



## UK LABELLING REQUIREMENTS

### The following are considered to be mandatory requirements

#### Required written warning statements

Allergen	Statement (in English)	Declaration threshold	Notes
Sulphur Dioxide	“Contains sulphur dioxide” (or sulphites/sulfites)	More than 10 milligrams per litre of SO <sub>2</sub>	Nearly all wines will have in excess of this level.
Egg and milk products	<p>“Contains --” followed by one of the following:</p> <p>‘egg’, ‘egg protein’, ‘egg product’, ‘egg lysozyme’ or ‘egg albumin’</p> <p>‘milk’, ‘milk products’, ‘milk casein’ or ‘milk protein’</p>	More than 0.25 milligrams per litre.	Use one of each term if both milk and eggs have been used and threshold is exceeded.

#### Minimum height requirements

Written warning statements must be at least 1.2 mm high based on the height of the lower case letter “x” of the font being used.



## REFERENCES

1. Regulation (EU) 579/2012  
<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32012R0579&from=EN>
2. Regulation (EU) No: 1169/2011 (food information for consumers)  
<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32011R1169&qid=1461072342439&from=EN>
3. Regulation (EC) No: 607/2009 (Wine labelling regulation)  
<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009R0607&qid=1461072492586&from=EN>
4. The Food Information Regulations 2014  
[http://www.legislation.gov.uk/uksi/2014/1855/pdfs/uksi\\_20141855\\_en.pdf](http://www.legislation.gov.uk/uksi/2014/1855/pdfs/uksi_20141855_en.pdf)

## 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](mailto:winestandards@foodstandards.gsi.gov.uk)