
Allergens Labelling for Wine

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](#).

Guidance prepared by
Wine Standards Team,

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Summary

Intended audience:	Bottlers, shippers, importers, wholesalers and UK producers
Which UK nations does this cover?	All UK countries
Purpose:	Guidance on labelling sulphur dioxide, and milk and egg fining agents which are allergenic.
Legal status:	Regulatory guidance
Key words	Wine, labelling, allergens, milk, eggs. sulphites
Review date	December 2021

Revision history

Revision No.	Revision date	Purpose of revision and paragraph number	Revised by
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
3.	July 2019	Update to reflect repealed EU regulations	Wine Standards Team

Contents

ALLERGENS LABELLING FOR WINE	1
SUMMARY	2
REVISION HISTORY	2
CONTENTS	3
INTENDED AUDIENCE	4
PURPOSE OF GUIDANCE	4
LEGAL STATUS OF GUIDANCE.....	4
EUROPEAN COMMISSION AND UK EGISLATION.....	4
UK LABELLING REQUIREMENTS.....	7
REFERENCES.....	7
REVIEW.....	7

Intended audience

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

Purpose of guidance

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.

Legal status of guidance

These guidance notes have been produced to provide advice on the legal requirements of the wine labelling Regulation (EC) No: 2019/33 and the EU Food Information for Consumers Regulations (EU) No: 1169/2011 in relation to the allergens labelling requirements for wine.

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](#).

European Commission and UK Legislation

1. 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 is also subject to certain “horizontal rules” in respect of food safety matters such as allergens warnings.
2. 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.
3. Any products labelled before 25th November 2005 and still in circulation can be sold with the label that was originally applied without an allergen warning. However, it is advisable to inform the consumer directly at the time of any sale or apply an additional slip label to the bottle stating the allergens present.
4. Wines labelled after June 2012 which are produced using egg or milk as fining agents must state an allergens warning on the label if residues of these products are detectable in the finished wine.

5. Any products labelled before June 2012 with detectable levels of milk/eggs and still in circulation can be sold with the label that was originally applied without a specific egg/milk allergen warning. However, it is advisable to inform the consumer directly at the time of any sale or apply an additional slip label to the bottle stating the allergens present.
6. 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.
7. However, the regulations specifically exempt wine (and other alcoholic beverages above 1.2% abv) from the need to show nutritional information or an ingredient 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 required in the wine labelling Regulation (EC) No: 2019/33.
8. Regulation (EC) No: 2019/33 has introduced **a minimum size** for the allergen warning. The warning must be clearly legible and must be equal to or greater than 1,2 mm, regardless of the character format used.
9. 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.
10. 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 ingredient 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 ingredient listing approach should discuss the proposed label

layout with their Regional Wine Inspector.

11. 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: 2019/33 Annex 1 Part B



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)	Equal to or more than 10 milligrams per litre of SO ₂	Most wines will have in excess of this level.
Egg and milk products	"Contains --" followed by one of the following: 'egg', 'egg protein', 'egg product', 'egg lysozyme' or 'egg albumin' 'milk', 'milk products', 'milk casein' or 'milk protein'	If detectable in the finished wine product by analysis	Use one of each term if both milk and eggs have been used and threshold is exceeded.

References

1. Regulation (EU) No: 1169/2011 (Food Information for Consumers)
2. Regulation (EU) No: 2019/33 (Wine Labelling Regulation)
3. The Food Information Regulations 2014

Review

The guidance will be reviewed in December 2021. If you wish to give comments on this guidance please email winestandards@food.gov.uk