

# White Book

# EU Wine labelling

Keys for compliance with Regulation (EU) 2021/2117

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Introduction to the new European legislation on wine labelling, which has the main objective of guaranteeing food safety for consumers and ensuring their right to information.

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# 01

# Objective

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# Objective

To achieve transparency for consumers, as well as harmonisation with the long-established rules in the food industry. Or in other words, the purpose of the new regulation on wine labelling is to offer consumers a base level of information so that they can choose the foods they consume and avoid practices that lead to deception.

If the nutritional information in foods refers to the presence of the energy value and nutrients present in the food, in wine there are certain nutrients listed in the nutritional information, such as alcohol, which can contribute to a medium or high energy value; the sugar content and, of course, the allergens.

Consequently, it is important to include these nutrients to provide the consumer with a basis for choosing the product they really want.

In turn, with this new legislation, the wine market responds and adapts to the needs and trends of today's consumer, who is increasingly demanding healthy and wholesome products in greater proportion. Increasingly, society wants to know more and is asking for transparency when deciding on one product or another.

With this new regulation, the consumer will be able to simply and easily gain access to the list of additives and nutritional value while the producer will not have to overload the bottle and deteriorate the visual of a container with an unattractive amount of information.





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# 02

# Community Measure

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# Legislative framework

The new legislative framework entering into force with Regulation (EU) 2021/2117 establishes new standards for the labelling of wine and aromatized wines. This regulation, published in 2021, replaces the previous Regulation 1308/2013, specifically its article 119, and adds new mandatory rules for all wine categories.

It also replaces Regulation 251/2014, adding a new article, article 6 bis, which introduces new **nutritional information** and the whole **list of ingredients**. In the case of de-alcoholised wines with less than 10 degrees of alcohol, the label must indicate the minimum shelf life date, which replaces the “Best before” label on any food product.

**Starting December 8, 2023**, it will be mandatory to follow these new rules. Until that date, any wine labeled without complying with the legislation may be sold, but starting that date, all wine that is labeled must comply with the new legislation.

In addition, the European Commission has pending the draft of a new Delegate Regulation which will replace Delegate Regulation (EU) 2019/33 and which will introduce rules regarding the list of ingredients. It will also add new rules for wines sold in bulk which, like those labeled, will require the list of ingredients to be included. All of this is still pending publication.






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# 03

# Contents

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Starting December 8, **Regulation (EU) 2021/2117**  published on December 2, 2021, will modify the rules for labelling wines and aromatised wines, and will require all wines sold in the EU to include the following on the label:



**Energy  
Values**



**Intolerances  
or allergies**



**Nutritional  
declaration**



**List of  
Ingredients**

Those wines produced and labelled before December 8, 2023, will not be affected and, therefore, will not need any modification to their labels. They can be placed on the market until they run out of stock.



# Definitions

## ● What is an ingredient?

According to Regulation (EU) No 1169/2011, on the provision of food information to the consumer, an **ingredient** is defined as: any substance or product, including flavorings, food additives and food enzymes or any component of a composite ingredient, used in the manufacture or preparation of a food product and still present in the finished product, possibly in a modified form. Residues are not considered ingredients.

Regulation (EU) 2019/934, of March 12, 2019, lists the authorised oenological practices and their classification as technological additives or adjuvants. Only additives are subject to labelling.

## ● What is an additive and what is an adjuvant?

A **food additive** is any substance whose intentional addition to food products has a technological objective, at the stage of manufacturing, transformation, preparation, packaging, transportation, conservation and has the effect that it or its derivatives become a compound of food products.

An **adjuvant** is defined as any substance voluntarily used in the transformation of the raw materials in food products or their ingredients to meet a certain technological objective during treatment or transformation. This may result in the unintentional, but technically unavoidable, presence of residues of this substance or its derivatives in the final product, provided that these residues do not present a health risk or have technological effects on the final product.

Examples: fining agents, etc.

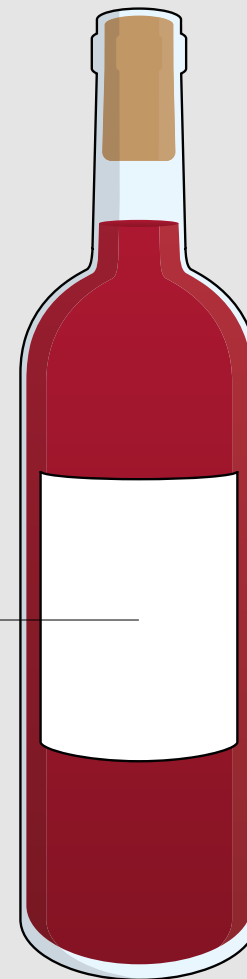


# Mandatory Standards

What additives are subject to labelling?

Whether a digital label or a physical label, it must indicate the additives used specifically in the ingredients list. It is recommended to put the category of the additive first, followed by the name of the additive in parentheses “()”. Also note that if the additive is an allergen, this must be indicated in **bold**.

- 1 Ingredients
- 2 Additives
- 3 Allergens



# Additives

According to Regulation (EU) 2019/934

- **Acidity regulators:** tartaric acid, malic acid, lactic acid, calcium sulphate, citric acid.
- **Preservatives and antioxidants:** sulphur dioxide, potassium bisulphite, potassium metabisulphite, potassium sorbate, lysozyme, ascorbic acid, dimethyl dicarbonate (DMDC).
- **Stabilisers:** citric acid, metatartaric acid, gum arabic, yeast mannoproteins, carboxymethylcellulose (CMC), potassium polyaspartate, fumaric acid.
- **Gases and packaging gases:** argon, nitrogen, carbon dioxide.
- **Other practices:** Aleppo pine resin, caramel\*.

*Additives with an asterisk (\*), are not authorised for winemaking.*

These additives recognized for winemaking can also be consulted in **Delegate Regulation 2019/934** 

# Physical alternatives

- **Alternatives to acidity correctors:** cationic resins\*, electromembrane treatments\*.
- **Alternatives to preservatives and antioxidants:** flash pasteurization and tangential microfiltration.
- **Alternatives to stabilisers:** electro dialysis\*, cationic resins\*, cold stabilization with or without potassium bitartrate\*.
- **Preventive winemaking practices** including bioprotection.

For more information, check the table available on page 11 to 23: **TABLE 2: AUTHORISED WINEMAKING COMPOUNDS AS REFERRED TO IN ARTICLE 3, PARAGRAPH 1**



## What should we include as an ingredient?

The most important ingredient, the grape, followed by the rest of the raw materials that are added to the wine, such as sucrose or concentrated grape must or additives in accordance with regulation (EU) 2022/68.

The **ingredients** must be listed in decreasing order of weight when they represent 2% or more of the finished product. Those ingredients that constitute less than 2% may be listed in any order after the other ingredients.

And, as discussed previously, **possible allergens** must be indicated in **bold** in the ingredients list.

This information is added to the mandatory information already present on the label and in no way replaces previous requirements.

# Exemptions

## Special cases

- Sulphur and its derivatives (E220 – E228). These ingredients may be grouped and listed as “preservatives (sulphites)”, as done currently.
- Carbon dioxide, argon and/or nitrogen. Can be listed as “bottled in protective atmosphere”.
- For sparkling wines. Liqueur d'expedition and liqueur tirage must appear in the ingredient list, alone or followed by the ingredients that compose said compounds.

### What food components can be omitted from the list of ingredients?

1. Those used as technological adjuvants.
2. Those whose presence in a food is due to the fact that they are contained in an ingredient, provided that it no longer fulfills a technological function in the finished product.





# Calculation

## How to express the nutritional information?

The nutritional information must be indicated as per 100 ml.

The following **must** be listed:

- The energy value.
- Saturated fats and fatty acids.
- Carbohydrates and sugars.
- Proteins.
- Salt.

**Optionally**, the following may be listed:

- Monounsaturated and polyunsaturated fatty acids.
- Polyalcohols.
- Starch.
- Dietary fibre.
- Vitamins and minerals in significant quantities. It may be important to include those found in significant quantities or those which give value to the product.



The energy value must be calculated using the conversion factors listed in Annex XIV of Regulation (EU) No.1169/2011, or using average values generally established and accepted by the sector.

In fact, the nutrition declaration on the label may be limited to the energy value (in kcal or kj), provided that information is fully accessible. The energy value really has more meaning for the consumer than the labeling of the complete nutritional table.

# According to Regulation (EU) 2021/2117

## Nutritional declaration

		Values/100ml
Energy value		x kJ
		x kCal
Fats		x g
	Saturated fats and fatty acids	x g
Carbohydrates		x g
	Sugars	x g
Proteins		x g
Salt		x g

The energy value must be calculated using the conversion factors listed in Annex XIV of Regulation (EU) No. 1169/2011, or using average values generally established and accepted by the sector.

Voluntarily, they may be expressed by unit of consumption or portion.

To do so, the following must appear on the label:

- Quantity of consumption or portion.
- Total number of portions in bottle.

# Electronic means

The **energy information**, like the declaration of calories in the United States, must be placed on wine labels with the letter “E”, for Energy.

**Possible allergens** must also be listed in a highlighted section under the word “Contains”.

Unlike mandatory label content, while information on ingredients and nutritional content is mandatory, it can be made accessible via a QR code or URL on the wine label.

All mandatory items, whether on a physical label or digital platform, must appear in the same visual field, in the same language in which it is marketed, and must be available for consultation throughout the useful life of the product.

## Restrictions

There are two especially important restrictions that wine producers and label manufacturers should consider for content that is provided through a QR code or URL.

### 01

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Electronic labels may not contain any other information intended for sale or marketing.

### 02

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User data cannot be collected or tracked by electronic means.



# QR Codes

## Advantages

The use of QR codes to comply with the EU legislation on wine labelling has a lot of advantages. Some of the most significant include the following:



They can automatically be translated to the proper language, depending on where the user scans the code.



The labels can be modified in real time, correcting any problem or error that is discovered after printing.



Large changes to physical labels can be avoided.





# Platforms

## Electronic labeling

Faced with these new labeling requirements, we provide different companies that can generate QR codes to help wineries comply with the new legislation and respond to the information and transparency needs of consumers.



*Click on each of the images to go to their website for more information.*



# Some practical information

## — Minimum font size of the nutritional information on the QR code:

The mandatory information listed in Article 9.1 shall be printed on the packaging or label in such a way as to ensure clear legibility in characters using a font size where the x-height, as defined in Annex IV, is equal to or greater than 1.2 mm.

## — Where to put the regulatory information

The regulatory information can be placed on the front or the back, provided that the label complies with article 13 of Regulation 1169/2011: “Mandatory information must be placed in a notable location where it is easily visible and clearly legible”. In addition, generic symbols are not sufficient; an explicit title, such as “ingredients”, is required when presenting the list of ingredients through the QR code, in accordance with IAC Regulation, Article 18 (1).

## — Languages

The mandatory information that goes on the label (either physical or digital) must be provided in all languages of the European Union where the product will be sold. If the wine is to be imported outside the European Union, it must comply with the regulations of the destination country.

## — Minimum QR size

The minimum recommended size is 1.31 cm x 1.31 cm with a margin of 0.16 cm on each side.

### 1 Minimum QR size



1.31 cm x 1.31 cm  
+ 0.16 cm margin

### 3 QR placement & content

Front or back label provided it is easily visible and clearly legible.

*The QR must always be accompanied by an explicit title.*

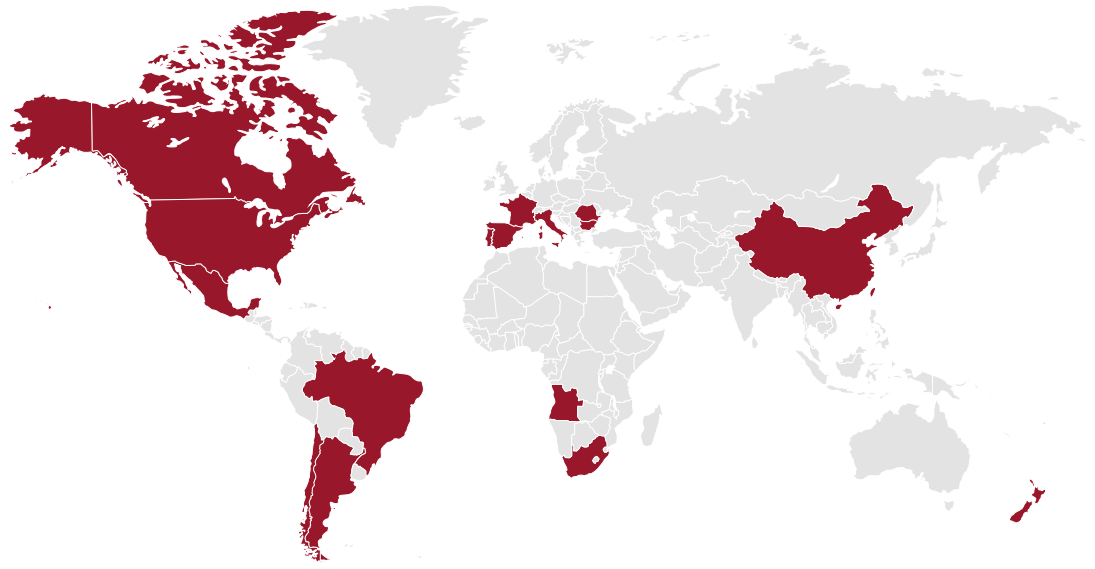
### 2 Minimum font size

Height “x” ≥ 1.2 mm

### 4 Multilanguage

Mandatory information must be shown in the EU languages where the product will be sold.

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