



Wine Labelling in the EU

In December 2021, the European Union published new rules concerning wine (Regulation 2021/2117), as part of their work to reform the EU Common Agricultural Policy (CAP). These new rules have been put in place to provide a higher level of information to consumers, and introduce a compulsory nutrition declaration (including energy) and a compulsory list of ingredients (including allergens or intolerances) for all wine products sold on the EU market beginning on December 8, 2023.

Producers must disclose:

- a nutrition declaration;
- an energy value; and
- a list of ingredients.

The new rules cover all wines and aromatized wines sold in the EU market. Wineries have the choice as to whether they share the information above with their EU consumers on their label, or using an electronic label. For wineries that opt to use an electronic label, there are certain elements of the above information that remain mandatory on-label (energy value per 100mL and any substances causing allergies or intolerances). These have been noted in **green text** in the below.

The regulation provides that wines produced and labelled before the compliance date of December 8, 2023 may continue to be sold on the market until stocks are exhausted. The EU defines a wine as being ‘produced’ when it has undergone alcoholic fermentation and achieved the required alcoholic strength and acidity content (defined as between 8.5% - 15% alc./vol. in the EU)¹, and potentially the implementation of some oenological practices to ensure proper vinification, proper preservation, or proper refinement of the product.

List of Ingredients

Producers must disclose a list of ingredients which complies with the EU’s law for all wine produced and labelled on or after 8 December 2023 and sold in the EU. It is important to note that, according to EU law, mandatory information on-label must be accurate, easy to see and understand, and not be misleading. The list of ingredients and nutrition declaration (including energy value) must appear in the same field of vision as other

¹ European Commission, [Regulation 1308/2013](#), Part II of Annex VII

compulsory particulars (i.e., product name, alcohol strength by volume, provenance, net contents, producer/ bottler name).

Regulation 1169/2011 (Food Information to Consumers, or FIC) – the chief regulation on the provision of food information to consumers in the EU – states that an ingredient is: “any substance or product, including flavourings, food additives and food enzymes, and any constituent of a compound ingredient, used in the manufacture or preparation of a food and still present in the finished product, even if in altered form.”

The ingredients list must be preceded by a suitable heading that consists of or includes the word “ingredients”. This remains the case if the ingredients list is accessed via an e-label. In such a case, a heading, containing the word ‘ingredients’ must appear on-label above the QR code. The list of ingredients must include all the ingredients of the wine, and requires listing grapes, additives, processing aids that may cause allergies or intolerances, sweetening and enrichment substances (e.g., sucrose/ sugar), tirage liqueur and expedition liqueur, as applicable. Yeasts which are used as processing aids do not have to be listed as ingredients (but yeast used as an additive must be listed e.g., yeast mannoprotein). The ingredients must be listed in descending order of weight and designated by their legal name². All ingredients constituting less than 2% of the finished product should appear after the main ingredients but thereafter do not need to follow a specific order³.

The rules within Regulation 2023/1606⁴ outline how certain ingredients ought to be labelled, as follows:

- The term ‘grapes’ may be used to indicate that fresh grapes and/or grape must are used as raw materials;
- The term ‘concentrated grape must’ may be used to indicate that ‘concentrated grape must’ and/or ‘rectified concentrated grape must’ are used.

Ingredients or processing aids that cause allergies or intolerances must be emphasized through a typeset that clearly distinguishes them from the rest of the list of ingredients, such as a different font, style or background colour⁵. Where the list of ingredients is presented by electronic means, all substances causing allergies or intolerances must be indicated on the wine label, preceded by the word ‘contains’.

Additives/ Processing Aids

The list of ingredients must indicate the additives used in the production of wine, as well as the processing aids that may cause allergies or intolerances (with a clear reference to the substance causing the allergy or intolerance). In accordance with Regulation

² European Commission, [Regulation 1169/2011](#), Article 18

³ European Commission, [Regulation 1169/2011](#), Annex VII, Part A, Point 6

⁴ European Commission, [Regulation 2023/1606](#)

⁵ European Commission, [Regulation 1169/2011](#), Article 21

1169/2011, processing aids causing allergies or intolerances, and still present in the final product – even in an altered form – must be indicated⁶.

Additives whose presence in a wine is solely due to the fact that they were “carried-over” to the wine by virtue of being contained in one or more ingredients of the wine (including, e.g., topping wines or components of a blend) and that serve no technological function in the finished product, shall not be required to be included in the list of ingredients.

Reminder: Permitted Oenological Compounds and Practices

Producers are reminded that all wine exported to the EU must comply with European law as it relates to the oenological compounds and practices permitted for use for wine sold on the EU market. The oenological compounds (i.e., additives and processing aids) permitted for use in wine sold in the EU do not exactly mirror those permitted for use in wine sold in Canada.

The oenological compounds that are permitted in wine sold in the EU are set out in Regulation 2019/934⁷:

- Acidity regulators
 - Tartaric acid (L(+)-)
 - Malic acid (D,L-; L-)
 - Lactic acid
 - Potassium L (+)-tartrate
 - Potassium bicarbonate
 - Calcium carbonate
 - Calcium tartrate
 - Calcium sulphate
 - Potassium carbonate
- Stabilizing agents
 - Potassium hydrogen tartrate
 - Calcium tartrate
 - Citric acid
 - Tannins
 - Potassium ferrocyanide
 - Calcium phytate
 - Metatartaric acid
 - Gum arabic
 - Tartaric acid D, L- or its neutral salt of potassium
 - Yeast mannoproteins
 - Carboxymethylcellulose
 - Polyvinylimidazole-polyvinylpyrrolidone copolymers (PVI/PVP)
 - Potassium polyaspartate
 - Fumaric acid
- Preservatives and antioxidants

⁶ European Commission, [Regulation 1169/2011](#), Article 9(c)

⁷ European Commission, [Regulation 2019/934](#), Annex I, Part A, Table 2

- Sulphur dioxide
- Potassium bisulphite
- Potassium metabisulphite
- Potassium sorbate
- Lysozyme
- L ascorbic acid
- Dimethyldicarbonate (DMDC)
- Sequestrants
 - Charcoal for oenological use
 - Selective vegetal fibres
- Activators for alcoholic and malolactic fermentation
 - Microcrystalline cellulose
 - Diammonium hydrogen phosphate
 - Ammonium sulphate
 - Ammonium bisulphite
 - Thiamine hydrochloride
 - Yeast autolysates
 - Yeast cell walls
 - Inactivated yeasts
 - Inactivated yeasts with guaranteed glutathione levels
- Clarifying agents
 - Edible gelatine
 - Wheat protein
 - Peas protein
 - Potatoes protein
 - Isinglass
 - Casein
 - Potassium caseinates
 - Egg albumin
 - Bentonite
 - Silicon dioxide (gel or colloidal solution)
 - Kaolin
 - Tannins
 - Chitosan derived from *Aspergillus niger*
 - Chitin-glucan derived from *Aspergillus niger*
 - Yeast protein extracts
 - Polyvinylpolypyrrolidone
 - Calcium alginate
 - Potassium alginate
- Enzymes
 - Urease
 - Pectin lyases
 - Pectin methylesterase
 - Polygalacturonase
 - Hemicellulase
 - Cellulase

- Betaglucanase
 - Glycosidase
- Gases and packaging gases
 - Argon
 - Nitrogen
 - Carbon dioxide
 - Gaseous oxygen
- Fermentation agents
 - Yeasts for wine production
 - Lactic acid bacteria
- Correction of defects
 - Copper sulphate, pentahydrate
 - Copper citrate
 - Chitosan derived from *Aspergillus niger*
 - Chitin-glucan derived from *Aspergillus niger*
 - Inactivated yeasts
- Other practices
 - Aleppo pine resin
 - Fresh lees
 - Caramel
 - Allyl isothiocyanate
 - Inactivated yeasts

Food additives and food enzymes need to be designated by the name of the applicable category, followed by their specific name (as opposed to their brand name) or E number (if appropriate)⁸. EU Regulation 2019/934⁹ provides the terms to be used to name the functional (applicable) categories, specific names and their associated E Numbers.

Additives categorized as ‘acidity regulators’ and ‘stabilizing agents’ and which are mutually substitutable may be indicated in the list of ingredients by using the expression “contains... and/or” followed by no more than three additives, where at least one is present in the finished product. It should be noted that the EU has limited flexibility in terms of differences in ingredients or additives between lots. Labels must reflect the ingredients used in a given lot. The one exception to this is for additives, where one additive was used in one lot and another additive in another lot. In this instance, the use of the expression “contains... and/or” with no more than three additives, where at least one is present in the finished product, is permitted.

The addition of tirage liqueur and expedition liqueur to wine products may be indicated in a list of ingredients by specifying ‘tirage liqueur’ and ‘expedition liqueur’, alone or accompanied, in brackets, by a list of their constituents, as laid down in Annex II to Delegated Regulation (EU) 2019/934. Per the aforementioned regulation:

- ‘tirage liqueur’ means the product added to the cuvée to provoke secondary fermentation;

⁸ European Commission, [Regulation 1169/2011](#), Annex VII, Part C

⁹ European Commission, [Regulation 2019/934](#), Annex I, Part A, Table 2

- 'expedition liqueur' means the product added to sparkling wines to give them special taste qualities. The expedition liqueur may contain only: sucrose, grape must, grape must in fermentation, concentrated grape must, rectified concentrated grape must, wine, or a mixture thereof, with the possible addition of wine distillate.

The indication of additives falling under the category 'packaging gases' in the list of ingredients may be replaced by the specific particular 'Bottled in a protective atmosphere' or 'Bottling may happen in a protective atmosphere'. If labelled this way, this statement must appear in the same field of vision as the list of ingredients. Where the packaging gases are indicated in the list of ingredients, they should be presented by the name of the applicable functional category, followed by their specific name or E number (if appropriate).

These rules apply when the list of ingredients is provided on the wine label, but also when the list of ingredients is provided by electronic means identified on the package or on a label attached thereto.

Where the list of ingredients is presented on the package or online via an electronic label, the physical label must continue to disclose any substance potentially causing allergies or intolerances (e.g., sulphites, egg, milk products) that are contained in the wine.

Nutrition Declaration

All wines and aromatized wine products sold on the EU market must communicate a nutrition declaration, expressed per 100 mL of wine. The mandatory nutrition declaration must include:

- an energy value, and
- the amounts of fat, saturates, carbohydrate, sugars, protein and salt¹⁰.

The nutrition declaration must be presented in a clear format, and in the following order: energy, fat (of which saturates), carbohydrate (of which sugars), protein, salt. The information should be presented in a tabular format with numbers aligned, as depicted below, or, where space is limited, the nutrition declaration may appear in a linear format. When the nutrition declaration is provided by electronic means the nutrition declaration should be presented always in tabular format with the numbers aligned, as space limitations would not apply.

¹⁰ European Commission, [Regulation 1169/2011](#), Article 30

DECLARATION	VALUE /100ml
Energy	kJ/kcal
Fat	g
of which saturates	g
Carbohydrate	g
of which sugars	g
Protein	g
Salt	g

If there is no content of certain of the elements above (e.g., for fat or saturated fat), that content can either be presented as '0' in the Value/ 100ml column, or those elements may be replaced in the nutrition table/ declaration by the statement 'Contains negligible amounts of ...' indicated in close proximity to the nutrition declaration (e.g., a row at the bottom of the nutrition table)¹¹.

Energy values must be expressed in kilojoules (kJ) and kilocalories (kcal) per 100 mL and are calculated using the following conversion factors¹²:

Substance	kJ/g	kcal/g
Fat	37	9
Carbohydrate (except polyols)	17	4
Polyols	10	2.4
Protein	17	4
Alcohol (ethanol)	29	7
Organic acid	13	3
Fibre	8	2

The declared energy and nutrient values should be average values and based on:

- the analysis of the food
- a calculation from the known or actual average values of the ingredients used, or
- a calculation from generally established and accepted data.

Guidance published by the European Commission indicates that:

- energy values should be rounded to the nearest kJ/kcal, and
- generally, the following tolerances and rounding are acceptable in the context of declaring nutrients in accordance with the EU law¹³:

¹¹ European Commission, [Commission Notice](#) – Questions and answers on the implementation of new EU wine labelling provisions following the amendment of Regulation (EU) No 1308/2013 of the European Parliament and of the Council and Commission Delegated Regulation (EU) 2019/33, Question 20

¹² European Commission, [Regulation 1169/2011](#), Annex XIV

¹³ European Commission, Health and Consumers Directorate-General, Guidance Document on Tolerances, https://food.ec.europa.eu/system/files/2016-10/labelling_nutrition-vitamins_minerals-guidance_tolerances_1212_en.pdf and https://food.ec.europa.eu/system/files/2016-10/labelling_nutrition-vitamins_minerals-guidance_tolerances_summary_table_012013_en.pdf

	Tolerances		Rounding	
	Quantity	Acceptable tolerance range	Quantity	Acceptable rounding
Fat	<10g/100mL	±1.5g	≤0.5g/100mL	“0g” or “<0.5g” may be declared
Saturates	<4g/100mL	±0.8g	≤0.1g/100mL	“0g” or “<0.1g” may be declared
Carbohydrate	<10g/100mL	±2g	≤0.5g/100mL	“0g” or “<0.5g” may be declared
	10–40g/100mL	±20%	>0.5g/100mL and <10g/100mL	To nearest 0.1g
	>40g/100mL	±8g	≥10g/100mL	To nearest 1g
Sugars	<10g/100mL	±2g	≤0.5g/100mL	“0g” or “<0.5g” may be declared
	10–40g/100mL	±20%	>0.5g/100mL and <10g/100mL	To nearest 0.1g
	40g/100mL	±8g	≥10g/100mL	To nearest 1g
Protein	<10g/100mL	±2g	≤0.5g/100mL	“0g” or “<0.5g” may be declared
Salt	<1.25g/100mL	±0.375g	≤0.0125g/100mL	“0g” or “<0.01g” may be declared
			>0.0125g/100mL and <1g/100mL	To nearest 0.01g

If a winery chooses to disclose the full nutrition declaration digitally, one element of the nutrition declaration must continue to appear on-label – the statement of the energy (i.e. calories) expressed per 100 ml. The physical label must include this statement, using the format “(100ml) E = ## kJ / ## kcal” (the symbol “E” was selected to denote information on energy contents to avoid the need for language translation). The information must be presented in both kilojoules and kilocalories.

On-label or electronic label

While these new labelling measures require all wine products to communicate, on a mandatory basis, the list of ingredients, the energy value and the nutrition declaration to consumers, producers can choose whether to do this on-label or via digital means (i.e., with detailed information on an electronic label, or “e-label”, which consumers are directed to via a QR code on-label). An electronic label (or “e-label”) is a dedicated webpage compiling structured information on a precise product, for a specific market. The e-label is made available to consumers through a unique QR code (or 1D or 2D other than QR) printed on the label of the product, accessible via a universal access tool (i.e., a smartphone) through a machine-readable code. By scanning the QR code with a

smartphone camera, consumers are directed to the e-label of the product they have scanned.

Where information is provided on-label, the list of ingredients and nutrition declaration must:

- be displayed in such a way to ensure clear legibility, in characters where the “x-height” is at least 1.2mm, and
- appear in the same field of vision¹⁴.

Where the full nutrition declaration is provided by electronic means, the energy value to be displayed on the package or on the label must be presented in the same field of vision as the other compulsory particulars (i.e., product name, alcohol strength by volume, provenance, net contents, producer/ bottler name). As with on-label stipulations, the QR code must appear directly on the wine label, be easily visible and clearly legible.

All mandatory consumer information must appear in a language easily understood by the consumers of the Member States where the wine is marketed (and may appear in several languages)¹⁵.

Regulation 2021/2117 provides wineries the option to make the full nutrition declaration and list of ingredients available by electronic means, but imposes certain conditions on wineries that choose to do so. Wineries should “avoid any collection or tracking of user data and do not provide information aimed at marketing purposes.” As such, because brand websites and apps contain information and content intended for sales and marketing purposes and tracking user data, the QR code or link to the ‘e-label’ cannot lead the consumer to a wine manufacturer’s website, but instead, to an independent website with this information. Just like with an on-bottle label, the QR code which routes consumers to the e-label should be displayed within a single field of vision alongside other mandatory on-label information, and an e-label should ensure legibility and clarity, as well as stability and durability of the information during the whole life of the product. This means that the label, and the associated e-label, should remain available to the consumer for at least as long as the wine is expected to remain suitable for consumption.

Wine Growers Canada is aware of a handful of companies that offer off-label solutions for producers. Each of these enterprises have different service offerings and pricing structures.

[U-Label](#), based in France, is perhaps the most well-known provider of off-label solutions for the wine and spirits sectors. The platform is open to all wineries based on a subscription fee service.

Other providers (with their respective domicile) include:

- [Atrify](#) (Germany)
- [Bottlebooks](#) (Germany)

¹⁴ European Commission, [Regulation 1169/2011](#), Articles 13 & 34

¹⁵ European Commission, [Regulation 1169/2011](#), Article 15

- [Scantrust](#) (Switzerland)
- [QualityChain](#) (Switzerland)
- [Vindix](#) (South Africa/ Spain)

Some of these providers offer an average energy calculation per 100mL of wine, when the wine category and alcohol by volume are entered. Some, too, offer automatic translation into more than one EU language, for wineries exporting to several EU countries.

Wineries are also permitted to develop the e-label technology in-house, but must ensure that, if they do so, consumers are directed to an independent website where consumers do not receive marketing or are tracked.