

# Latest Updates on the EU wine regulation for Exporters



**Linfield**  
University



*e-label.io*

# COLLABORATION



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Lawyer specialising in wine law  
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Co-founder of the start-up IMERO

IMERO was founded in 2021 and has a team of over 20 employees

# Agenda

Current state of the regulation 2021/2117

Implications

Nutrition & Ingredients

Marketing & Tracking

Translations

Environmental - Italy

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# EU- REGULATION 2021/2117

came into force on December 8th.

Products such as wine, sparkling wine, pearl wine, non-alcoholic wine, and aromatised wine "produced" after December 8<sup>th</sup> 2023 must be accompanied by a nutrition table and a list of ingredients from 8 December 2023.

This requires changes to the label, the order lists and the webshop.

## Nutrition information

	100ml
Energy	301 kJ/72 kcal
Carbohydrates	1 g
· sugar	1 g
Contains small amounts of: Fat,saturated fat,Protein,Salt	

## Ingredients

Grapes, Sucrose , Acidity regulators:  
Tartaric acid (L(+)-) , Preservatives and  
antioxidants: **Sulfites**

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# BACK-LABEL

Each producer has the choice of whether the information is provided directly on the label or in a so-called "off-label" solution using a QR code.

Exceptions are the indication of energy values (kilocalories/kilojoules) and allergens: these must be indicated directly on the label regardless.

Implications



**2023 Pfalz Riesling**

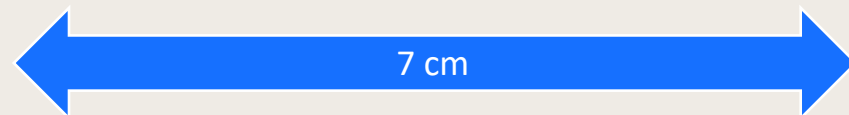
**Bottler: Weingut IMERO D-81454 Munich**

German quality wine A.P. No.: 5 123 456 05 12,5 % vol 0,75 L

List of ingredients: grapes, sucrose, acidity regulators: E334 and/or E270, stabilizers: E330, E353 and/or E290, antioxidants: **sulphites**, E220

100 ml contain on average	
Energy	332 kJ (78 kcal)
Carbohydrates	1,7 g
. sugar	0,7 g

Contains small amounts of fat, saturated fat, protein and salt



**2023 Chardonnay**

This high-quality Chardonnay delights with its wonderful variety of flavours and brilliant fruitiness. This wine is an excellent accompaniment to dishes such as lasagne, potato gratin, vegetable casseroles, poultry and fish.

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Bottled by:/ Gebottled door:/ Mis en bouteille par:/ Embottelado por:/ Engarrafado por:/ D-RP 042 092

Distribution by :/ Gedistribueerd door:/ Distribué par:/ Distribuido por:/ Imero Holding GmbH,Bruggspergerstraße 88a, 81545 München, Deutschland

Ingredients and Nutritional Values

E in 100 ml  
304 kJ/73 kcal

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Contains Sulfites 12,0%vol. 75 Cl 8-10°

0 123456 789012

**IMERO** i

**Chardonnay 2023**

Quantity  
750 ml

Grape variety  
Chardonnay

Vintage  
2023

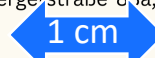
**Nutrition information**

	100ml
Energy	301 kJ/72 kcal
Carbohydrates	1 g
. sugar	1 g

Contains small amounts of:  
Fat,saturated fat,Protein,Salt

**Ingredients**

Grapes, Sucrose , Acidity regulators: Tartaric acid (L(+)-) , Preservatives and antioxidants: Sulfites



# WEB SHOP

With E-Label



Trauben und Anbau

<b>Siegel</b>	Bio
<b>Geschmack</b>	trocken
<b>Weinart</b>	weiß
<b>Trauben</b>	Sauvignon Blanc
<b>Boden</b>	Lößlehm

Zutaten/Nährwertdeklaration: [Link](#)

Without E-Label



Analysedaten

<b>Alkoholgehalt</b>	13,0 % vol.
<b>Säure</b>	6,0 g/l
<b>Restsüße</b>	0,3 g/l

Trauben und Anbau

<b>Siegel</b>	Bio
<b>Geschmack</b>	trocken
<b>Weinart</b>	weiß
<b>Trauben</b>	<a href="#">Sauvignon Blanc</a>
<b>Boden</b>	Lößlehm

Bio

Lieferzeit

2-3 Tage

96,00 €

1

+



Inkl. 19% MwSt., exkl. Versandkosten

Inhalt: 1,5 l (64,00 €/l l), enthält Sulfite, Alkoholgehalt: 13,0 % vol.

Beschreibung

Es ist ein Wein, der sehr fein die rebsorten-typischen eigenwilligen, pikanten Johannis- und Stachelbeer- aromen und „grüne“ Noten zeigt. Darüber hinaus prägen diesen Sauvignon Blanc aber auch noch Charaktereigenschaften wie seine besondere Textur, feine mineralische Noten, einem rauchigen Charakter und nicht enden wollender Länge, welche er durch Ausbau und Herkunft erhält. Es ist ein REBHOLT-Spitzenwein mit großartigem Entwicklungspotenzial, der seine perfekte Trinkreife erst nach einigen Jahren erreichen wird.

<b>2023 Pfalz Riesling</b>	
<b>Abfüller: Weingut DLR D-67435 Neustadt</b>	
Deutscher Qualitätswein A.P. Nr.: 5 123 456 05 12,5 % vol 0,75 L	
Zutatenverzeichnis:	100 ml enthalten durchschnittlich
Trauben, Saccharose, Säureregulatoren:	Brennwert 332 kJ (78 kcal)
E334 und/oder E270, Stabilisatoren: E330, E353 und/oder E290, Antioxidantien:	Kohlenhydratrate 1,7 g
Sulfite, E220	davon Zucker 0,7 g
Enthält geringfügige Mengen von Fett, gesättigten Fettsäuren, Eiweiß und Salz.	

Web-link (left) vs static table (right)

Implications



17.01.24

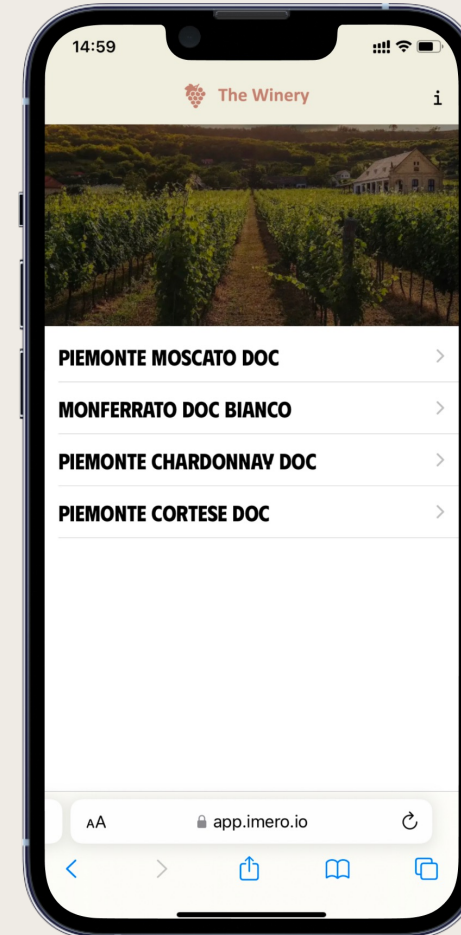


# PRICING LIST & CATALOGUE

Implications



<b>PREZZI VINI 2022</b>	
<i>Vini Bianchi</i>	
PIEMONTE CORTESE DOC	5€
★ PIEMONTE CHARDONNAY DOC	6€
MONFERRATO DOC BIANCO (100% Sauvignon blanc)	6€
PIEMONTE MOSCATO DOC	5€



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# NUTRITION:

Similar content for analogue and digital implementation.

- Table with “Big Seven” nutrition values (energy, fat, saturated fat, carbohydrates, sugar, proteins, salt).
- Since wine usually does not contain fats, protein or salt, the table can be shorter (see example on the right).
- Digital: add energy values to the label:
  - E(100 ml): ... kJ/ ... kcal

## Nutrition information

	100ml
Energy	301 kJ/72 kcal
Carbohydrates	1 g
· sugar	1 g
Contains small amounts of: Fat,saturated fat,Protein,Salt	

Nutrition information / ingredients



E in 100 ml: 297 kJ/71 kcal

# INGREDIENTS

It is sufficient to write them in one of the official languages of the EU.

If an ingredient belongs to a class, you must specify the class name (e.g. "acidity regulators" or "stabilizers") and the ingredient either in full or as an E number.

If the wine is fortified, mention either "sucrose" or "sugar".

"Grapes" or "must"

## Ingredients

Grapes, Sucrose , Acidity regulators:  
Tartaric acid (L(+)-) , Preservatives and  
antioxidants: **Sulfites**

It may not be known at the time of label printing which **acidity regulator** will be included. In this case, you can write e.g. E 334, E296 or E270. Up to three options may be named here. One of them must be included at the end.

### Preservatives:

Either you write sulfites, or list all of them individually.

Important: If they are allergens, they must be written in **bold**.

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# What is Marketing?

Marketing and Tracking of users is explicitly prohibited

- Hosting on one's own website is not recommended (problems: correct display, tab-bar, analytics, complexity...)
- Logo and a neutral image serve to identify the wine and are accepted
- Backlinks to the own website or shop are considered marketing
- Certifications are considered marketing

May I include my Logo?

Can I link to my webpage or shop?

Can I include certifications e.g. for sustainability?

Can I host the information on my website?



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17.01.24

# Language on the back-label and on the landing page

Translations

On the back-label, the legal information e.g. the caption "Ingredients and Nutritional Information" needs to be provided in one official language of the European Union e.g. in English.

In the E-Label, the information is automatically translated into all 27 EU languages.



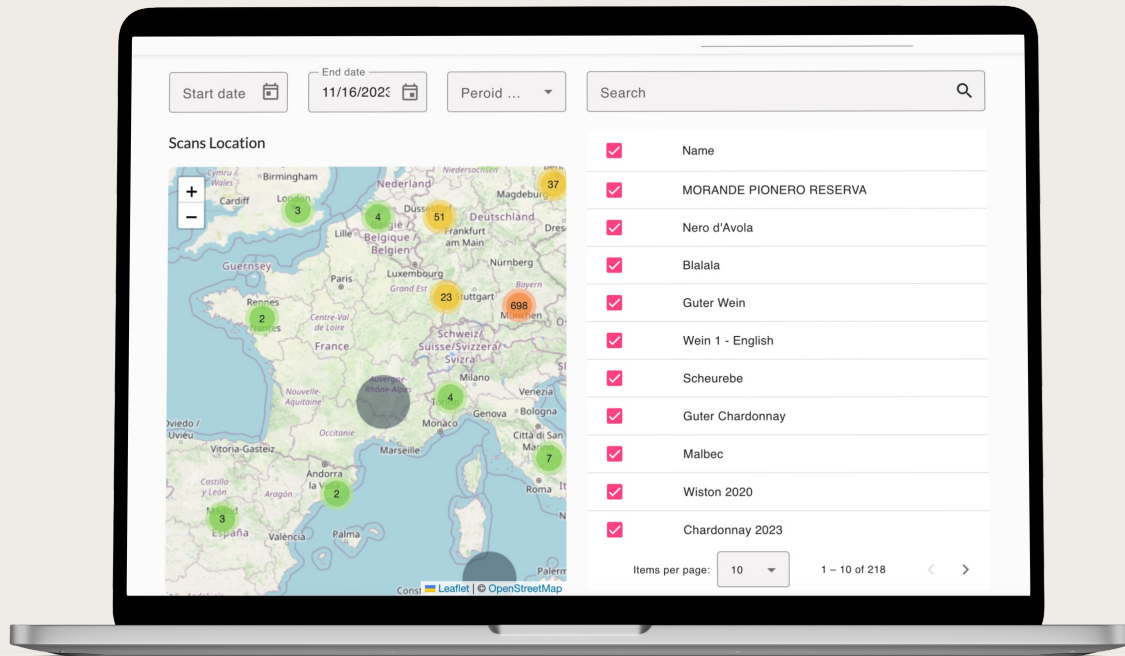
The back-label design includes the e-label.io logo, a QR code, and the following text: "Ingredients and Nutritional Values", "E in 100 ml", "304 kJ/73 kcal", "Contains Sulfites", "12,0%vol.", "75 Cl", "8-10°", and a barcode with the number "0 123456 789012".





# Counting scans based on Language

Translations



To display the correct language, anonymous country information is necessary. E-label.io provides this information to wine-makers.

- The information is completely anonymous and cannot be used for exact location tracking

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# NEW RECYCLING INFO

As of 2023, it is mandatory to include disposal information in Italy

You can see an example on the right.

You may also officially provide the information digitally as a QR code, or integrate it into your e-labels.

In 2024, France and Scandinavia will follow suit.

Examples of recycling information in Italy

## Recycling-Informationen

Flasche	Verschluss	Käfig	Korken
GL 70	ALU 41	ALU 41	FOR51 51
Glas	Aluminium und Metall	Aluminium und Metall	Korken
Glas-Sammlung	Aluminium-Sammlung	Aluminium-Sammlung	Sammlung von speziellem Abfall

Überprüfen Sie die örtlichen kommunalen Richtlinien. Trennen Sie die Komponenten und entsorgen Sie sie ordnungsgemäß.

For certain materials (e.g. cork), recycling information changes at municipality level. A general message reading "Follow the municipality's rules" is sufficient.

# NEW RECYCLING INFO

As of 1<sup>st</sup> of January 2024, California also added wine and spirits to their recycling program.

Starting January 1, 2024

- **Certified Recycling Centers** Must Accept All CRV Containers.
- New additions may not have CRV labels until July 1, 2025.

## Changes to the Beverage Container Recycling Program

Starting January 1, 2024, California's Beverage Container Recycling Program adds new beverages and new containers.

### New Beverages

Wine | Liquor | Juice



Subject to CRV (with or without label)

### New Wine and Liquor Containers

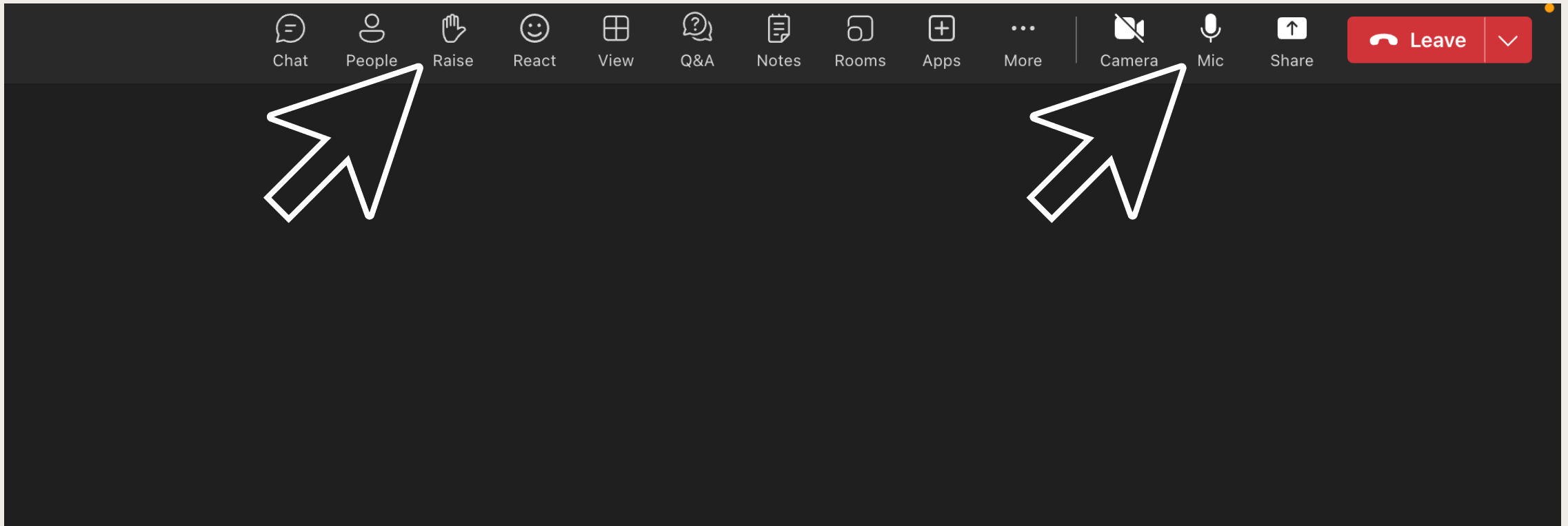
Pouches | Boxes | Cartons



Subject to CRV (with or without label)



# Q&A



## Where should the QR code be placed on the physical label? Does it also have to be on the front label if all other legal information is there?

All legal information must be in the same field of vision and must be visible without having to rotate the bottle. In other words, if I include everything on the front, I must also place the e-label here (Art. 40 para. 1 of Regulation (EU) 2091/33).

## Can I write the energy value upright?

If the other legal information is horizontal (except for allergens and the AP number, which can also be written vertically), I also have to add the energy value horizontally. If I decide to make all the information upright, I also have to write the energy value upright.

## What is the minimum size of the QR code?

There is no fixed regulation on this. The QR code must work flawlessly from a technical point of view. As a rule, a QR code is easily readable from a size of 1cm x 1cm. The specification that the QR code must be 1.5 cm x 1.5 cm in size only applies to the Italian Recycling Act (IHK Trier).



## Does the new regulation also apply to grape juice?

Grape juice has been covered by the Food Information Regulation for some time and must therefore already provide information on ingredients and nutritional information. However, unlike wine, these details may not be provided via QR code / e-label.

## How long does the QR code have to be held?

The e-label must be kept in place for as long as the associated wine is in circulation on the market. In other words, as long as a person can buy the wine in the official trade, this person must have the opportunity to find out about the nutritional values and ingredients before buying.

## Which alcohol value is relevant for calculating nutritional values?

It is only about the existing alcohol content (i.e. residual alcohol), not the total alcohol content.

## Does it make a difference at what stage an acid was added, for the acid to be declared as an ingredient or not?

No, it doesn't make any difference. Acids must always be indicated, regardless of the stage of production at which they are used.

## If I have removed an acid, do I still have to declare it?

Yes, the acidity must still be declared as an ingredient, as the wine may still contain traces of the extracted acidity.



## Is it permissible to use the phrase "May contain small quantities of ... " instead of "Contains small amounts of...?"

'Article 34(5) of the FIC-Regulation states that indications of small quantities can be replaced by indications such as 'Contains small quantities of ...'. Such replacements, however, must be listed in close proximity to the nutrition declaration. „Since the wording of such indications is not clearly predetermined, I would say you can also use "Can contain small amounts of ...““(Dr. Eichele, Rohwedder & Partner).

## Does fruit wine also require a nutrient table and a list of ingredients?

"No, only products within the meaning of EU wine law (i.e. those listed in Annex VII, Part II of Regulation (EU) No. 1308/2013) and aromatised wine products within the meaning of Regulation (EU) 251/2014 are covered. Spirits, fruit wines and even mixed beverages containing wine (e.g. spritzers) are not covered" (Dr. Eichele, Rohwedder & Partner).

## Can I also place the QR code on a dark background and/or use glossy foils?

There are no precise rules on this. However, the QR code must work perfectly from a technical point of view. CCL is already in the process of testing the functionality of various QR code variants. Initial tests have shown that glossy films do not work. On the other hand, it looks better with matt films. As expected, it has been shown that the functionality increases with the size of the QR code. Therefore, please contact CCL for special requests. They will be happy to advise you and test different display options quickly and easily.

# WHO IS IMERO?

We are a software company based in Munich. Since our foundation in 2021, we have enjoyed growth from customers of all sizes, as well as the trust of market leaders from various industries.

## Contact Us.



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A selection of our global customers in the wine sector



*Santa Rita*



**ROMBEAU**



**TASTER WINE**

DRAUTZABLE

