

NEW ZEALAND WINE  
PURE DISCOVERY

**New Zealand Winegrowers**  
**INTERNATIONAL LABELLING GUIDE**

*9th Edition – December 2007*

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*This document represents our interpretation of the labelling regulations of various countries as at December 2007, based on legislative texts, guidance material and discussions with regulators. All due care and attention has been exercised in the preparation of the information contained in this document. However, labelling regulations will change over time, and interpretations may differ between regulators. We will endeavour to provide regular updates on labelling matters as they come to hand. Nevertheless, this document is not intended to be the definitive source on wine labelling matters, as this will always be in the hands of the regulators who administer them. Nor is it intended to be a substitute for detailed legal advice in specific cases.*

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## DESIGNING A WINE LABEL

The wine label is an integral part of every winegrower's business identity. Designing a wine label can be a real challenge. Not only does it need to look good and be effective in communicating your message, it also needs to comply with all the legal requirements for wine labels. Legal compliance becomes even more of a challenge when you are exporting to multiple markets.

Because almost every country in the world has different labelling requirements, it is very difficult to design a label that will be acceptable in every export destination. The easiest export destination to label for is Australia, which shares the same labelling standards as New Zealand. Even then, there are a few things to bear in mind such as minimum content for vintage, variety and origin, and using EU or Australian geographical indications.

For every other market, you will need to change your label. However, it is possible to design your labels so that your front label remains unchanged and you only need to change the back label. This reduces costs and allows for a consistent image to be put across to your different markets. This works for USA, EU and Aus, but not for Canada because of its front label requirements. At present, there are two sets of options available for doing this. We have provided examples of these options on the following pages. This is only a guideline and is not intended to be definitive. We have not included optional information that you may put on the label in these options. You should consult the relevant section of the labelling guide and the relevant legislation when designing your labels.

*Please note that this guide and the options below relate principally to labelling for a 750ml bottle of still table wine. Different requirements will apply to other types of wine, such as sparkling and fortified wines, and other formats, such as wine casks. If you have any queries regarding such products, please contact us.*



**Back label: EU\***

Imported by Mas Vino Ltd London, United Kingdom		
New Zealand Wine, Marlborough		
13%vol.	L1234	750ml
Contains sulphites / Enthält sulfite		

**Back label: USA†**

<i>John's</i>		
Marlborough Merlot 2004		
New Zealand Wine		
Imported by Mas Vino Ltd. 1122 Wall St New York, New York		
13%alc. by vol.		750ml
Contains Sulphites		
<b>GOVERNMENT WARNING:</b> (1) According to the Surgeon General, women should not drink alcoholic beverages during pregnancy because of the risk of birth defects. (2) Consumption of alcoholic beverages impairs your ability to drive a car or operate machinery, and may cause health problems.		

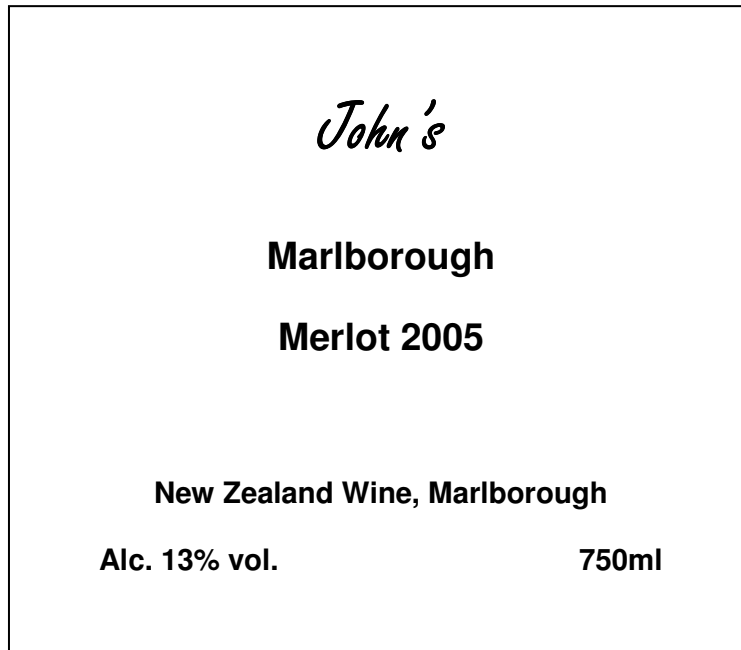
\* NB: The sulphite declaration shown can be used in UK, Austria, Belgium, Estonia, France, Ireland, Malta, Portugal, Spain, Sweden, Germany & Luxembourg. If the wine is to be sold in France, the pregnancy health message would also need to appear on this label.

† This label must be designated as the "brand label" when the application for a certificate of label approval is made.

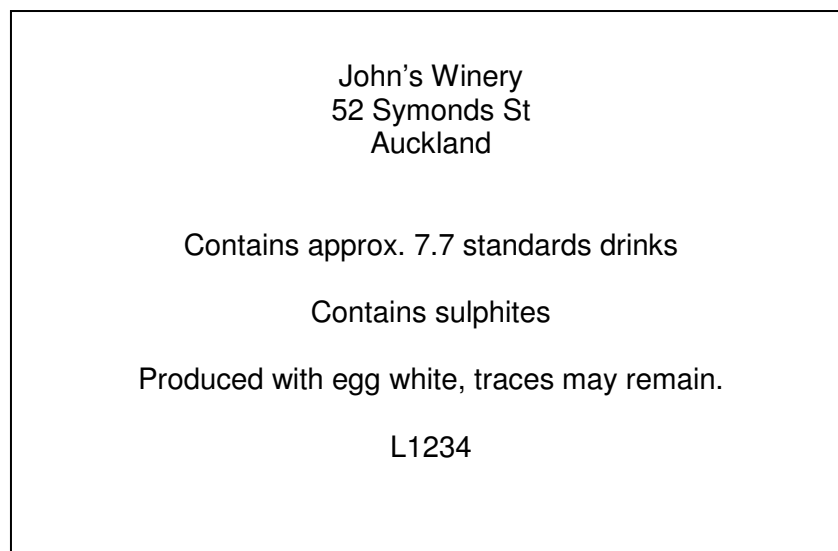
## OPTION 2: Common mandatory information on front label

This multi-market label option applies for NZ, Australia, EU and USA. The front label includes the mandatory information that NZ, Aus, EU and USA share in common on the front label, with other mandatory information on the back label.

### Front label<sup>‡</sup>



### Back label: NZ Aus



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<sup>‡</sup> This label must be designated as the "brand label" when the USA application for a certificate of label approval is made. The alcohol declaration must be no more or less than 3mm, and the net contents at least 4mm for this to work.

**Back label: EU<sup>§</sup>**

Imported by  
Mas Vino Ltd  
London,  
United Kingdom

L1234

Contains sulphites / Enthält sulfite

**Back label: USA**

Imported by  
Mas Vino Ltd.  
1122 Wall St  
New York, New York

Contains Sulphites

**GOVERNMENT WARNING:** (1) According to the Surgeon General, women should not drink alcoholic beverages during pregnancy because of the risk of birth defects. (2) Consumption of alcoholic beverages impairs your ability to drive a car or operate machinery, and may cause health problems.

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<sup>§</sup> NB: This label option would not work for France as the pregnancy warning need to appear in the same field of vision as the alcohol declaration. The sulphite declaration shown can be used in UK, Austria, Belgium, Estonia, Ireland, Malta, Portugal, Spain, Sweden, Germany & Luxembourg.

## **“NEW ZEALAND WINE”**

“New Zealand Wine” is the identity and brand that we all share. Since all of our export markets require the country of origin to be shown on the label, there is an opportunity to turn this legal requirement to our marketing advantage. Most countries now provide some flexibility in way that the country of origin declaration is presented, so that it is now possible to use the term “New Zealand Wine” as opposed to “Wine of New Zealand” or “Product of New Zealand”.

Where possible, we recommend that producers use “New Zealand Wine” on their front label to highlight our brand. This will allow producers to meet their legal requirements in a way that maximizes the opportunity for exposure of our national “brand”. The effect will be enhanced as more producers choose this option.

Countries that accept “New Zealand Wine”:

- NZ
- Australia
- USA
- EU Member States
- Canada (must be accompanied by French translation).

## THE MATRIX – A QUICK GUIDE TO LABELLING REQUIREMENTS

LABELLING ITEM	NEW ZEALAND	AUSTRALIA	EU	USA	CANADA
<b>Product name</b>	mandatory wine, type of wine, grape variety (e.g. "wine", "sparkling wine", "Chardonnay") any label	same as NZ	mandatory wine (+ country of origin) (e.g. "wine of New Zealand") same FOV as volume and alcohol	mandatory type of wine, grape variety (e.g. "white wine", "sparkling wine", "Chardonnay") if grape variety is used, must have geographical indication not "wine" same label as brand name and alcohol (brand label) type size ≥2mm	mandatory English & French wine, type of wine (e.g. "wine – vin", "white wine – vin blanc") front label type size ≥1.6mm based on lowercase "o"
<b>Net contents</b>	mandatory 750ml, 75cl, 7.5dl, .75l type size ≥2mm	same as NZ	mandatory 750ml, 75cl, .75l same FOV as product name (+ country of origin) and alcohol type size ≥4mm	mandatory 750ml any label may be marked in bottle type size ≥2mm	mandatory <b>750ml</b> front label numbers bold letters ≥1.6mm based on lowercase "o"
<b>Alcohol declaration</b>	mandatory "x% alc. vol.", "x% vol." or similar any label tolerance +/- 1.5%	same as NZ	mandatory "x%vol." or "alc.x%vol." same FOV as product name (+ country of origin) and contents type size ≥3mm must be expressed to nearest 0.5% tolerance +/- 0.5%	mandatory "alc.x% by vol." "x% alc. by vol." "alc. x% vol." or similar same label as product name and brand name (brand label) type size 1mm-3mm not emphasised in any way tolerance +/-1.5% for wines 7-14% tolerance +/-1% for wines 14%+ must not cross 14% tax boundary (e.g. 13.5% cannot be labelled 14.5%)	mandatory "x% alc./vol." front label type size ≥1.6mm based on lowercase "o" abbreviated version is bilingual for tolerance, see guide

LABELLING ITEM	NEW ZEALAND	AUSTRALIA	EU	USA	CANADA
<b>Country of origin</b>	mandatory “wine of NZ”, “NZ wine”, “product of NZ” or similar any label 100% from country/countries stated	same as NZ	mandatory “wine of NZ”, “NZ wine” same FOV as alcohol and contents 100% from country stated	mandatory “wine of NZ”, “NZ wine”, “product of NZ” or similar any label	mandatory English & French “product of New Zealand – produit de Nouvelle- Zélande” or “New Zealand wine - vin de Nouvelle- Zélande” front label type size ≥1.6mm based on lowercase “o” minimum content 75% from country stated
<b>Producer/importer details</b>	mandatory name and physical business address of supplier in NZ or Aus any label “supplier” can be producing winery, bottler or vendor	same as NZ	mandatory name of importer, local administrative area, and Member State of head office whole statement must be same lettering and type size if a GI is used, importer details must be half size of GI type	mandatory “imported by [name of importer][address of principal place of business]” any label type size ≥2mm special rules if bottled in USA	mandatory English and French name of producer or distributor (registered business name), principal place of business (incl. city and country) any label type size ≥1.6mm if importer’s name is used, must say “imported by/for – importé par/pour” or else use a GI
<b>Brand name</b>	permitted no specific requirements	same as NZ	permitted no specific requirements	mandatory brand or name bottler or importer same label as product name and alcohol (brand label) type size ≥2mm	permitted no specific requirements

LABELLING ITEM	NEW ZEALAND	AUSTRALIA	EU	USA	CANADA
<b>Sulphite declaration</b>	mandatory "contains preservative 220/sulphur dioxide/sulphites" any label required if over 10 mg/kg	same as NZ	mandatory "contains sulphites" "contains sulphur dioxide" language specified by Member State any label required if over 10 mg/kg	mandatory "contains sulfites" or "contains sulphites" any label required if over 10 mg/kg type size ≥2mm	will soon be mandatory  "contains sulphite/contient – sulphite" or "contains sulphating agent/contient des sulphites"
<b>Allergen declaration</b>	mandatory various forms (see labelling guide) any label required if fish, egg, milk products present	same as NZ	not required	not required if used all allergens must be declared in specified form "Contains: egg"	not required
<b>Standard drinks</b>	mandatory "contains approx. x standard drinks" any label	same as NZ	not required different calculation used	not required different calculation used	not required different calculation used
<b>Lot identification</b>	mandatory not specified any label if only one lot, label provides lot identification	same as NZ	mandatory L [alphanumeric characters] any label	not required	not required
<b>Geographical indication</b>	permitted 85% minimum content descending order of proportion	permitted single GI 85% minimum content 2-3 GIs 95% total, 5% each	controlling item - required if vintage, variety etc used same FOV as country of origin, alcohol and contents immediately after or below country of origin only one GI allowed may not be "NZ" 85% minimum content	required if vintage used same FOV & label as product name (variety) must be on list of GIs lodged with TTB only one GI allowed may not be "NZ" if using vintage 75% minimum content	permitted 85% minimum content descending order of proportion

LABELLING ITEM	NEW ZEALAND	AUSTRALIA	EU	USA	CANADA
<b>Health warning</b>	not required	not required	mandatory for France only “La consommation de boissons alcoolisées pendant la grossesse, même en faible quantité, peut avoir des conséquences graves sur la santé de l'enfant.” or pictogram same FOV as alcohol declaration	mandatory <b>“GOVERNMENT WARNING: (1) According to the Surgeon General, women should not drink alcoholic beverages during pregnancy because of the risk of birth defects. (2) Consumption of alcoholic beverages impairs your ability to drive a car or operate machinery, and may cause health problems.</b> any label ≥2mm first two words bold caps rest of statement not bold no more than 25 words per inch	not required
<b>Vintage</b>	permitted 85% minimum content	permitted 85% minimum content	only permitted if GI is used 85% minimum content (concurrent with variety)	only permitted if GI is used 85% or 95% minimum content depending on GI	permitted 85% minimum content
<b>Variety</b>	permitted 85% minimum content descending order of proportion	permitted single variety 85% minimum content 2-3 varieties 85% total, 20% each 3+ varieties 95% total, 5% each	only permitted if GI is used single variety 85% minimum content 2-3 varieties, 100% content 3+ varieties, 100% content, different FOV from compulsory items, ≤3mm descending order of proportion	must appear with brand and alcohol single variety 75% minimum content multiple varieties, must state all varieties with % type size ≥2mm	permitted 85% minimum content descending order of proportion
<b>Other names (producer, distributor, marketer)</b>	permitted	permitted	marketers details permitted if truthful and accurate name of enterprise may be used if owner has granted permission	producer's name permitted “produced by...”	producer and/or agent permitted subject to conditions above

LABELLING ITEM	NEW ZEALAND	AUSTRALIA	EU	USA	CANADA
<b>Production methods</b>	permitted	permitted	permitted must be fair representation of method used restrictions if considered "traditional term"	permitted	permitted
<b>Bottling details</b>	permitted	permitted	info on bottling in region of production permitted must be a fair and accurate representation	"estate bottled" 100% from grapes grown on land owned or controlled by winery, located in the viticultural area that appears on label producer must crush and ferment the grapes, finish, age and bottle the wine at the same winery in stated viticultural area	permitted
<b>Indication of colour</b>	permitted	permitted	permitted if truthful and accurate restrictions on colour indications that are traditional terms (e.g. "ruby", "tawny")	permitted	permitted
<b>Sweetness levels</b>	permitted	permitted	permitted limits for use of "dry", "medium dry", "medium", "medium sweet", "sweet"	permitted	permitted
<b>Awards and medals</b>	permitted	permitted	only permitted if competitions listed in EU regs	permitted	permitted
<b>Organic claim</b>	permitted	permitted	only permitted in certain circumstances if accompanied by official assurance	only permitted in certain circumstances if accompanied by official assurance	only permitted if accompanied by official assurance (which NZFSA do not currently provide for Canada)

FOV: Field of Vision – information presented so that a consumer can read it without having to turn the bottle

GI: Geographical indication

TTB: US Alcohol Tax and Trade Bureau

# NEW ZEALAND

## What laws apply to labelling in New Zealand?

The main laws governing the labelling of wine for sale in New Zealand are the Food Act 1981 (which incorporates the standards found in the Australia New Zealand Food Standards Code), the Food (Safety) Regulations 2002, the Weights and Measures Regulations 1999, the Wine Act 2003, the Wine Regulations 2006, the Wine (Specifications) Notice 2006, and the Fair Trading Act 1986. Copies of all of these laws can be found on the Government's legislation website [www.legislation.govt.nz](http://www.legislation.govt.nz). The Food Standards Code can be found at [www.foodstandards.govt.nz](http://www.foodstandards.govt.nz).

## What do I have to have on the label?

There are nine mandatory items of information for the labelling of wine sold in New Zealand. These are listed below. With one exception, there are no minimum type size or placement requirements for any of these mandatory items. All that is required is for mandatory items to be written or set out legibly and prominently such as to afford a distinct contrast to the background, and in the English language (Standard 1.2.9). The only item for which type size and placement requirements are specified is net contents.

All information on a wine label (as well as any other material used to present or describe a wine) is subject to the provisions of the Fair Trading Act 1986, which prohibits misleading or deceptive conduct in trade, conduct that is liable to mislead in respect of goods, and false or misleading representations as to the quality, grade composition, style or nature of products. This Act applies even if a label is in all other respects legally compliant. The Bell Gully Winegrower's Legal Handbook provides some useful guidance in relation to the Fair Trading Act.

### **1. Name of food**

A wine label must include a name or description sufficient to indicate the true nature of the food (Standard 1.2.2). In the context of wine this would be the word "wine", the type of wine (e.g. "sparkling wine", "white wine" etc, a variety name, or a generic name such as Port).

### **2. Lot identification**

A wine label must include a lot identification on the label - which includes printing on the bottle (Standard 1.2.2). However, if there is just one bottling of a particular wine then there is no need for a separate lot number, as the lot is self-defined.

### **3. Name and address of supplier**

A wine label must include the name and business address in New Zealand or Australia of the supplier (Standard 1.2.2). The "supplier" may be the producing winery, packer, vendor or importer. The address should be a physical address.

Note that the person named on the label is presumed to be responsible for the product and will be legally liable for that product under the Food Act 1981.

#### **4. Alcohol declaration**

A wine label must include an alcohol declaration (Standard 2.7.1). The acceptable form for the declaration is “ml/100g” or “ml/100 ml” or “x% alcohol by volume” or words or expressions of the same or similar meaning: i.e. “% vol” will suffice.

Tolerances of the declared alcohol content from that actual alcohol content are:

- fortified wine +/- 0.5%.
- wine and sparkling wine +/- 1.5%.

#### **5. Standard drinks**

A wine label must include a standard drinks declaration (Standard 2.7.1). A standard drink is the amount of wine containing 10 grams of ethanol measured at 20° C. If the product contains less than 10 standard drinks then the statement of the number of standard drinks must be accurate to 1 decimal place. If the product contains more than 10 standard drinks then the statement of the number of standard drinks must be accurate to the nearest whole number.

The form of the standard drink statement is: “contains approx. x.x standard drinks”. The word ‘approximately’ may be spelt in full if desired.

Standard drinks must be calculated on the actual alcoholic content of the wine, regardless of the tolerances for stating alcohol content. The formula for calculating the number of standard drinks is: ***0.789 x the actual alcohol content x the volume of the container (in litres)***.

So for a wine with an actual alcohol content of 12.2% in a 750 ml bottle the formula is: ***0.789 x 12.2 x 0.75 = 7.2***.

#### **6. Net Contents**

A wine label must include a statement of the net contents, expressed as litres, decilitres, centilitres or millilitres (e.g. 750 ml). This statement should be at least 2mm in height, placed in a prominent position, in close proximity to the name of the product and in a colour that contrasts distinctly with the background (R.79, Weight & Measures Regs 1999). “Prominent position” has been interpreted as meaning front or back label in this context.

#### **7. Country of Origin**

A wine label must include a statement indicating the country of origin (e.g. “New Zealand wine”, “Product of New Zealand”) (Standard 1.1.3A). This is essentially a 100% standard. If any of the grapes, grape juice, concentrated grape juice or spirit used in a wine originates in another country, then that must also be included on the label.

## **8. Sulphite Declaration**

A wine label must include a sulphite declaration if it contains more than 10 mg/kg of sulphur dioxide. The form of the statement is: “contains preservative 220”, “contains sulphites”, or “contains sulphur dioxide”. Note that this is not a “warning statement” in terms of the Food Standards, and the type size requirements therefore do not apply.

## **9. Allergen Labelling**

A wine label must include an allergen declaration if fish, milk, or egg products are present (Standard 1.2.3). This means that, for practical purposes, a wine fined with isinglass, milk, milk products (including casein), egg whites or other egg products (including lysozyme) should bear an allergen declaration even though these substances may only be present in wines in minute or non detectable quantities. Wines labelled before 20 December 2002 are exempt from this requirement.

The form of the labelling requirement is not specified in legislation. The following forms of declaration were suggested in legal advice from Bell Gully:

- “[Fish/Milk/Egg] products have been used as a fining agent in the manufacture of this wine. Traces may remain.”
- “Fining agent: [fish/milk/egg] products.”
- “[Fish/Milk/Egg] products have been used to purify this wine, in accordance with traditional winemaking techniques. Traces may remain.”

The following additional forms of declaration were developed by the Australian Wine and Brandy Corporation in consultation with Food Standards Australia New Zealand. If exporting to Australia, it may be preferable to use these forms:

- “Produced with isinglass (fish product).”
- “Contains/produced with fish product.”
- “Produced with isinglass (fish product). Traces may remain.”
- “Produced with fish products. Traces may remain.”

## **What optional information can I use on the label?**

There are very few restrictions on the information that you can use on the label of a bottle of wine. Wine labels are prohibited from bearing health claims, or making representations as to being low in alcohol or non-intoxicating. The Advertising Standards Authority’s “Code for Advertising Liquor” and the Alcohol Advisory Council’s “National Guidelines on the Naming, Packaging and Merchandising of Alcoholic Beverages” are also relevant. These deal with issues relating to marketing of alcohol in relation to matters such as motor vehicles, sports, minors, and decency.

Wine labels, like all material used to present or describe wine, must not be false, misleading or deceptive, or liable to mislead or deceive in terms of the Fair Trading Act.

### ***Grape variety, vintage and origin***

From vintage 2007, new rules for label claims covering grape variety, vintage and the area where the grapes were grown (other than the country of origin) will come into force, as follows:

- A label that claims the wine is a single grape variety, a single vintage or from a single area must be at least 85% from the stated variety, vintage or area. For example, if a label says the wine is '2007', at least 85% of that wine must be from the 2007 vintage.
- A label that states the wine is a blend of grape varieties, vintages or areas of origin, at least 85% of the blend must be from the stated varieties, vintages or areas. For example, if the wine label says 'Chardonnay Chenin Blanc', then at least 85% of that wine must have been made from chardonnay and Chenin blanc grapes.
- Where a label claims the wine is a combination of grape variety, vintage, and area of origin, the combination referred to must be at least 85% of that wine. For example, if a label states that the wine is a '2008 Marlborough Pinot Noir', then 85% of the wine must be from the 2008 vintage AND be from Marlborough AND be made from pinot noir grapes.
- Where a label refers to more than one grape variety, more than one vintage, or more than one area, these must be presented in descending order of proportion in the blend. Using the 'Chardonnay Chenin Blanc' example above, as well needing to meet the 85% rule, there must be a greater proportion of chardonnay than Chenin Blanc in the blend.
- A label must not include a claim about grape variety, vintage or area of origin if that wine contains a greater percentage of wine from another grape variety, vintage or area of origin that is not referred to by that label. For example, a wine that contains 75% Cabernet Sauvignon, 15% Pinotage and 10% Merlot could be referred to as a 'Cabernet Pinotage' or a 'Cabernet Pinotage Merlot' but not a 'Cabernet Merlot'.
- Cultures of micro-organisms used to make wine may be excluded from the minimum content calculations (up to a maximum of 50ml/L) as can brandy or other spirit used for fortifying wine.

### ***Exemptions***

Wines made from the 2006 and earlier vintages are exempt from the 85% rules, but remain subject to the current 75% requirement for statements about grape variety and the Fair Trading Act.

A further exemption is provided to allow wine makers to blend out wine from vintage 2006 or earlier in accordance with the old rules. If a blended wine contains more than 50% wine from the 2006 vintage or earlier, and that wine is blended before 1 July 2008, then the old rules continue to apply.

## *Cabernet*

With regard to the use of the word “Cabernet” as a varietal descriptor, NZFSA has advised that:

- It is acceptable to use Cabernet as a synonym for Cabernet Sauvignon but not for Cabernet Franc or a combination of those two varieties.
- If Cabernet Franc is part of a wine label claim about grape varieties, it must be named in full.

## *Exports*

The 85% rule is now a benchmark minimum content for all New Zealand wine, whether sold domestically or exported. This means that, in principle, all wine made from 2007 onwards and exported from New Zealand must be made in accordance with the 85% rule above, subject to the following:

- If the overseas market has a stricter labelling requirement, in which case the overseas market requirement must be complied with.
- If the overseas market has a less strict requirement and the NZFSA has given specific permission for exporters to use the less strict requirement applying in that market, then the less strict requirement is available to exporters. The USA is the major market with a less strict requirement, and it is anticipated that an NZFSA permission for this market will be forthcoming before vintage 2007 is exported.

## ***Batch consistency***

Good winemaking practice suggests that where a wine has been produced and bottled in a number of batches, those batches should be consistent in terms of organoleptic characteristics and chemical profile (allowing for testing tolerances and the effects of maturation). Where batches of wine are produced that are not representative of other wine sold under the same label in a single market, we recommend that these be distinguished through their labelling. For example, early batches of wine for immediate release could be labelled as “Early Release”, “First Release” or similar.

## **What else should I know?**

### ***Cleanskins***

Wines sold as “cleanskins” still need to comply with labelling regulations when they are sold at retail or in the on trade.

If cleanskin wines are sold at wholesale, they must still bear the product name (e.g. “wine”, “Cabernet Sauvignon”, “Port”), lot identification and name and address of the supplier on the bottle or carton. Further information on mandatory labelling requirements must be provided to the wholesale purchaser on request.

## **Cartons**

Outer packaging does not need to be labelled or marked if it is for the purposes of transportation and distribution only and of a kind intended to be removed before the food is offered for retail sale and is customarily not taken away by the purchaser of the food.

However, if you intend to sell wine at retail by the case, then:

- each bottle should be properly labelled; and
- the outer carton should bear the product name (e.g. wine, Chardonnay etc) together with either the number of the bottles contained in the outer package and the quantity of each of those bottles (e.g. 12 x 750ml) or the total quantity (e.g. 9 litres).

If you are selling unlabelled cleanskins at wholesale, you need to mark the carton as set out above.

NB: These guidelines apply to New Zealand only. Different countries or importers (e.g. Canada's LCBO) may have their own requirements.

## **Barcodes**

There is no legal requirement to include a barcode on your label. In practical terms however, they are usually required by retailers.

A barcode is simply a method for encoding in machine-readable format a unique number for a product (called a Global Trade Item Number, GTIN). (The GTIN is the number printed beneath a barcode). The GTIN for every item must be unique globally; to ensure that happens companies worldwide become members of GS1 and are allocated a unique range of numbers to turn into barcodes for individual products.

The EAN-13 barcode encoding a 13 digit GTIN is the barcode used in New Zealand, Australia, Asia and Europe and is generally acceptable worldwide for retail/consumer items (e.g. individual bottles of wine, cartons of wine to be sold by the case). However, for historical reasons, the USA and Canada have used a 12-digit GTIN encoded into a barcode called a UPC-A. Most retailers in North America after 1 January 2005 should accept EAN-13 barcodes, but some still require a UPC-A. Please ask GS1 New Zealand for assistance should you come across this requirement.

Some retailers and wholesalers require special barcodes on cases and pallets of wine, either for automated scanning on conveyor belts (an ITF-14 barcode encoding a 14-digit GTIN) or for traceability purposes (an EAN-128 barcode that can encode details such as batch, processing date, Global Location Number of the vineyard etc).

It is vital that before printing your labels that you check that your barcode scans easily. A 'pass' on the international standard for barcode quality – a 'verification test' - is often a trade requirement, and certainly for major retailers (Foodstuffs, Progressive, Coles, Woolworths etc) in Australia and New Zealand. (All members of GS1 New Zealand get 10 free verification tests

per year.) For further information and assistance contact GS1 New Zealand at [www.gs1nz.org](http://www.gs1nz.org) or 04-494 1050.

### ***Organic claims***

The manufacture and labelling of organic wine is not specifically regulated in New Zealand . If official assurance of a product's organic status is required by a particular export market, organic claims can be certified by registering with the NZFSA's Official Assurance Programme for Organic Products. Products submitted for official assurance are then certified by third party agencies such as Biogro or Agriquality. For more information on the NZFSA Official Organic Assurance Programme, contact Afreen Rahman on 04 463 2647 or [afreen.rahman@nzfsa.govt.nz](mailto:afreen.rahman@nzfsa.govt.nz).

### ***Wines over 15% alcohol***

There is no legal maximum alcohol limit for table wine or fortified wine in New Zealand. However, fortified wine over 15% alcohol may not be sold in a supermarket, but may be sold in other off-licensed premises.

Wines over 15% total alcohol (i.e. actual alcohol plus the potential alcohol of unfermented sugars) may not be sold in the EU market. This means that not only dry wines with an actual alcohol of over 15%, but also sweet wines which have a total alcohol of over 15%, may not be sold in the EU.

NB: Exise is payable at the higher fortified wine rate if a wine is over 14% alcohol and has been fortified with spirits. However, if a table (i.e. unfortified) wine is over 14% alcohol it does not qualify for the higher excise rate. It is the addition of fortifying spirit, rather than the alcohol level, that makes a wine qualify for the higher excise rate.

# AUSTRALIA

## What laws apply to labelling in Australia?

Australia shares the Food Standards Code with New Zealand, so New Zealand wines labelled in accordance with the Code will also be good for Australia as regards mandatory information. Also, the Trans Tasman Mutual Recognition Agreement (TTMRA) and the Australia New Zealand Closer Economic Relations Trade Agreement (ANZCERTA) mean that, in general, a wine that can be legally sold in New Zealand can also be sold in Australia.

## What do I have to have to have on the label?

If your label has the required mandatory items for the New Zealand market, then it can also be used in the Australian market.

## What optional information can I use on the label?

Again, the situation is generally the same as applies in New Zealand, although there are two areas where care is needed.

### *Vintage, variety and origin*

One such area relates to statements of vintage, variety and origin. In Australia, minimum content requirements exist for vintage, variety and origin. These specific requirements do not apply to New Zealand wines under the TTMRA.

However, the Australian Trade Practices Act does apply to prevent misleading or deceptive labelling for wines sold within Australia. It is not difficult to imagine that an Australian Court would consider their own minimum content requirements to be the benchmark for what is misleading or deceptive to consumers. Given this grey area, it would be prudent to be guided by the Australian requirements when exporting to that country. The requirements are as follows:

- For vintage, an 85% minimum content requirement applies.
- Where only one variety is used on a label, an 85% minimum content requirement applies.
- Where up to three varieties are named, the minimum content for all varieties combined is 85%, and for each named variety 20%. These must be presented in descending order of proportion.
- Where three to five varieties are named, the wine must be comprised 100% from the named varieties (excluding up to 5% for the incorporation of additives). The minimum content for each named variety is 5%. The varieties must be presented in descending order of proportion.
- Where one geographical indication is used, the minimum content is 85%.

- Where up to 3 geographical indications are used, the minimum content for all geographical indications combined is 95%, and for each named geographical indication is 5%. These must be presented in descending order of proportion.

### **Protected names**

The Australian provisions on the protection of certain European and Australian geographical indications and traditional terms (called “protected names”) are excluded from the mutual recognition arrangements between Australia and New Zealand. This means that New Zealand producers may not use any registered protected names on their wine labels unless they comply with the conditions attached to those names.

Exporters should take note of the following advice from the Australian Wine and Brandy Corporation:

*Please note that it is illegal to use protected names [other than in compliance with the prescribed conditions] in the description and presentation of wine in any context whatsoever, even in an otherwise true statement in textual form on a back label (eg. ‘this wine is made from a typical Bordeaux blend of grapes’, or ‘Marsanne is a native variety of the Rhone Valley’, or ‘my family have grown grapes in Chianti for generations’, or ‘this wine is from vineyards near the famous Barossa Valley’ or ‘this wine is equal to a top Hunter Semillon’). Protected Names are only protected when describing a wine, but it is difficult to say that anything on a wine label is not describing that wine. Note that country names are also protected.*

*To clarify the boundaries for use of Protected Names, you could, in say promotional material use Protected Names to describe family history, or discuss generally the wine styles you make, or comparing your climate conditions with European regions etc but whenever you are describing a particular wine then Protected Names can not be used in any context.*

## EUROPEAN UNION

### What laws apply to labelling in the EU?

All Member States of the European Union share the same general labelling laws. In some cases, different authorities in various countries will have different interpretations of those laws, or additional national requirements. **All New Zealand wine exported to the EU must comply with EU labelling requirements, rather than New Zealand requirements.** The EU labelling regulations are not the same as New Zealand's. They reflect a different philosophical approach to labelling with origin being of paramount importance, and the wine being a complete agricultural product with no identifiable constituent parts.

The main laws are Regulation 1493 of 1999 (the core EU wine law) and Regulation 753 of 2003 (the wine labelling law). Copies of these regulations can be found on the "Members" section of the [www.nzwine.com](http://www.nzwine.com) website. There are a number of other laws that touch on aspects of labelling, such as fair trading, allergen declarations and organics. Because the EU requires that certain matters must be regulated by the New Zealand government if they are to be used on a wine label, the New Zealand government also has some rules around using optional labelling terms. These are set out in the Wine (Export to European Union) Notice 2003, a copy of which can be found on the NZFSA website at [www.nzfsa.govt.nz/wine/](http://www.nzfsa.govt.nz/wine/).

The UK Wine Standards Board, which is responsible for administering the labelling laws for the UK, also provides a label checking service for wines going into that market. If you are designing a label for the EU, we recommend that you have your label checked by the Wine Standards Board before going to print.

### What information do I have to have on the label?

There are six items of information that must appear on the label of a New Zealand wine exported to the EU (seven for wines sold in France). The sales designation, volume statement and alcohol statement (items 1-3 below) must appear in a single field of vision. If a geographic indication is used, this must also appear in the same field of vision. The UK Wine Standards Board has indicated that information in the single field of vision should be clearly distinguishable from all other content of a label and should be printed horizontally. All other compulsory statements must be easily readable, in indelible characters large enough to stand out against the ground on which they are printed and clearly distinguishable from all other content of the labelling. It is permitted to repeat mandatory information in other places on the label. These rules apply to wines that are held for sale or placed on the market in the EU (i.e. not to samples that are not held or offered for sale).

#### **1. Sales Designation (Product name + country of origin)**

All imported wine labels must bear a "sales designation", which is a combined product name and country of origin requirement. This can appear as "Wine of New Zealand", "New Zealand

Wine” or “New Zealand Red Wine”. It must appear in the same field of vision as the volume statement and the alcohol statement.

## **2. Volume statement**

All imported wine labels must bear a volume statement. This must be expressed in litres, centilitres or millilitres, and must be at least 4mm in height when appearing on a 750ml bottle. It must appear in the same field of vision as the sales designation and the alcohol statement.

## **3. Alcohol statement**

All imported wine labels must bear a statement of alcoholic content. This must be expressed as x% vol. in whole or half units (e.g. 12% vol., 12.5% vol.) It may be preceded by the words “Actual alcoholic strength”, “Actual alcohol” or “Alc.”. The minimum print size is 3mm for a 750ml bottle. The tolerance for the alcohol statement is +/- 0.5%. It must appear in the same field of vision as the volume statement and the sales designation.

## **4. Lot number**

All imported wine labels must bear a lot number on a label or on the bottle. This should appear as “L” followed by an alphanumeric code (e.g. “L1234” or “L123AB”).

## **5. Importer details**

All imported wine labels must bear the name of the importer, together with the local administrative area and Member State in which their Head Office is located. These must all appear in the same lettering and type size. If a geographical indication is used, the importer details must be in lettering that is no more than half the size of the geographical indication.

## **6. Sulphite and allergen declarations**

The EU regulations on sulphite declarations will be now in force. This means that all wines for sale in the EU Member States must bear a sulphite declaration if they contain more than 10 mg/l of sulphur dioxide and were labelled after 25 November 2005. Wines that are placed on the market or labelled before that date may continue to be sold while stocks last.

The form of the declaration is *contains sulphites* or *contains sulphur dioxide* in the approved language of the market in which the wine is sold. The declaration can appear on any label.

Many EU Member States require that the sulphite declaration is in the national language or languages. This will present difficulties for wineries exporting to multiple EU markets, as it may be necessary to have different sulphite declarations for each market. A list of the relevant languages is attached as Appendix 2. You should note the following points:

- English is accepted for the sulphite declaration in the following Member States: Austria; Belgium; Estonia; France; Ireland; Malta; Portugal; Spain; Sweden; UK.
- You can print the sulphite declaration in more than one language.
- If you add German, you can also send your wine into Germany and Luxembourg.

- If you add Swedish, you can also send your wine into Denmark and Finland.
- If you add Dutch, you can also send your wine into the Netherlands.
- The UK and Ireland will now accept the declarations spelt in the US form (i.e. "Contains sulfites") and the US will accept the declaration spelt in the English form (i.e. "Contains sulphites").

Allergen declarations for fish products are not required in the EU. From 31 May 2009, a wine label must include an allergen declaration if milk or egg products were used in its production. The form of the declaration will be "contains" followed by the name of the ingredient – e.g. "contains egg products".

Each Member State must enact its own rules on allergen labelling, raising the likelihood that this declaration will have to appear in multiple languages – similar to the sulphite declaration. This situation will become clearer once Member States have enacted their rules (which must take place before 31 May 2008).

#### **7. France only – pregnancy health warning**

French law requires all wine to bear the following health message and/or pictogram:

« La consommation de boissons alcoolisées pendant la grossesse, même en faible quantité, peut avoir des conséquences graves sur la santé de l'enfant. »



The text of the message means: "The consumption of alcoholic beverages during pregnancy, even in small quantities, can have serious effects on the health of the child."

The health message should be written in contrasting type, so as to be visible, readable, clearly comprehensible, and indelible. It must not be obscured or interrupted by other indications or images. It does not need to be in any particular colour or size.

The health message must appear in the same field of vision as the alcohol declaration. This has implications for how labels are designed for multiple markets that include France. If you wish to avoid having to put the health message on your front label, you will need to place all of your "single field of vision" information (which includes the alcohol declaration) on the back label. You may still repeat the "single field of vision" information on the front label if desired.

Wines that have been placed on the market or labelled before 3 October 2007 may continue to be sold without the health message until stocks have been exhausted.

The UK has confirmed that this warning/pictogram is acceptable in their market, but we have not received such confirmation from other markets. We have received advice that the TTB has indicated that the French warning/pictogram is not acceptable in the USA.

The UK also recommended the inclusion of a responsible drinking statement such as “Please drink responsibly” on key brands.

## **What optional information can I use on the label?**

The key to using optional information on a wine label in the EU is the geographical indication. If you want to use other key terms such as vintage and variety, you first have to have a geographical indication on the label. We expect that most, if not all, wine exported to the EU would bear a GI. Therefore, this section deals specifically with the requirement for a 750ml bottle of still wine bearing a geographical indication. Sparkling wines also have a different set of rules, and are not covered here. If you would like assistance with labelling for wine without a geographical indication, or for sparkling wine, please contact us.

### ***Geographic indication***

*Geographical indication is a “controlling item” in the EU, meaning that you must have a geographical indication on the label in order to any of the items of optional information listed below.*

To use a geographic indication, the wine must be at least 85% from the stated region. No more than one geographic indication may be used on a label. The geographic indication must appear in conjunction with the sales designation, alcohol statement and net contents. The UK Wine Standards Board interprets this as meaning that it must appear on the same line or directly below the sales designation (e.g. “Wine of New Zealand, Nelson”). Provided that the GI appears once in this position, it can be repeated elsewhere on the label.

### ***Grape variety***

A grape variety may be only used on the label of a wine that bears a geographical indication.

Only varieties that are on the EU list of approved varieties may be used. Most of the vinifera grape varieties grown in New Zealand are on the list, although hybrid varieties are problematic.

The minimum content for a single grape variety is 85%. Two or three varieties may be used on a label. The wine must be derived 100% from the stated varieties and they must be presented in descending order of proportion. More than three varieties may also be used under the same conditions, but they must not be in the same field of vision as the compulsory particulars and statement must not be larger than 3mm.

Where a single grape variety appears in conjunction with a vintage, then the 85% rule applies concurrently (e.g. if a wine label says 2004 Cabernet Sauvignon, then it must contain at least 85% 2004 Cabernet Sauvignon).

The EU has advised that “White” is not an acceptable designation for a wine made from a red grape variety. Designations such as “White Zinfandel” or “White Cabernet” will no longer be permitted.

### ***Vintage***

A vintage date may be only used on the label of a wine that bears a geographical indication.

The minimum content for a vintage date is 85%. Where a single grape variety appears in conjunction with a vintage, then the 85% rule applies concurrently (e.g. if a wine label says 2004 Cabernet Sauvignon, then it must contain at least 85% 2004 Cabernet Sauvignon).

### ***Traditional terms***

“Traditional terms” are terms that the EU considers should be used exclusively with specific European geographical indications. This is a recent development, and does not appear to be fully enforced as yet. However, exporters should be aware that a number of “traditional terms” are now protected in the EU in their specified language. Key “traditional terms” of relevance to New Zealand exporters include: Auslese (Ger), Chateau (Fr), Clos (Fr), Classic (Ger), Domaine (Fr), Fine (It), Noble (Sp), Ruby (En), Spatlese (Ger), Superior (Por), Tawny (En), Villages (Fr) and Vintage (En).

It is not clear exactly what this means for New Zealand wine exporters, since almost all New Zealand wine labels going into the EU will be in the English language.

### ***Production method***

Where a production method is used on a wine label (e.g. “oak aged”, “barrel fermented”), it must be a fair representation of the production method used. This is a requirement contained in the NZFSA Export Notice.

### ***Marketer’s details***

Where marketer’s details are included on a wine label, they must be truthful and accurate. This is a requirement contained in the NZFSA Export Notice.

### ***Colour***

Where an indication of wine colour is used on a wine label, it must be truthful and accurate. This is a requirement contained in the NZFSA Export Notice.

### ***Name of enterprise***

The name of an enterprise may be used on a wine label where the enterprise has consented to its use. This is a requirement contained in the NZFSA Export Notice. Presumably this applies where an enterprise name that is not required to be on the label is referred to (e.g. a winery or grower).

### ***Bottling in region of production***

Where information that a wine has been bottled in the region of production is included on a wine label, it must be a fair and accurate representation. This is a requirement contained in the NZFSA Export Notice.

### ***Sweetness levels***

Where the word “dry” is used on a wine label in any of the official languages, the wine must have a residual sugar content of no more than 4 g/l. However, if the total acidity expressed as grams of tartaric acid per litre is not more than 2 grams below the residual sugar content, then “dry” can be used for wines having up to 9g/l residual sugar.

Where the words “medium-dry” are used, the wine must have a residual sugar content of no more than 12 g/l.

Where the words “medium-sweet” are used, the wine must have a residual sugar content of between 12g/l and 45g/l.

Where the word “sweet” is used, the wine must have a residual sugar content of at least 45g/l.

### ***Awards and medals***

Awards and medals may not appear on a wine label unless the competitions in which they were awarded have been approved by the EU. No New Zealand competitions have yet been approved. However, most of the major UK wine competitions have been recognised and can therefore appear on a wine label, notably: the International Wine Challenge, Decanter Awards, the International Wine and Spirit Competition and the Institute of Masters of Wine Certificate and Seal of Excellence. The major State competitions in Australia are also approved, so awards and medals from the competitions that allow New Zealand entries can be used as well.

### ***Standard drinks***

The NZ standard drinks declaration should not appear on an EU wine label. It is not a legal requirement and many EU member states calculate standard drinks of alcohol units differently.

The UK’s Portman Group has recently introduced a voluntary labelling guideline in order to promote consistency in alcohol unit labelling. If a company chooses to unit label its products, the guideline provides the preferred form of alcohol unit calculation, display of unit labelling information and a “UK unit” icon which has been adopted by most UK drinks companies. For further information, the guideline can be accessed at:

<http://www.portmangroup.org.uk/?pid=28&level=3>

### ***The “e” mark***

The “e” mark is a symbol that may be used alongside the net contents to signify that a bottle has been filled according to the average quantity system and is backed up by some sort of verification process. It is not a mandatory requirement.

### ***Organic claims***

The term “organic wine” is not currently allowed on labels in the EU, but the expression “Wine made from organic grapes” is permitted if supported by an assurance certificate issued by NZFSA. However, the newly adopted Council Regulation (EC) No 834/2007 on organic

production and labelling of organic products has created the basis for an organic wine labelling framework.

***Other information***

Wine labels may include other material not covered above, provided that there is no risk that such material might be misleading, particularly by creating confusion with the compulsory or optional items discussed above.

# USA

## What laws apply to labelling in the USA?

USA labelling regulations reflect a different history and legal system from either New Zealand or the EU, notably the legacy of prohibition and concern over product liability lawsuits. As with the EU, **all New Zealand wine exported to the USA must comply with USA labelling requirements, rather than New Zealand requirements.**

The USA labelling regulations are contained in the Code of Federal Regulations, Title 27, Part 4. A copy of these regulations can be found on the “Members” section of the [www.nzwine.com](http://www.nzwine.com) website.

These regulations are administered by the Alcohol and Tobacco Tax and Trade Bureau (TTB, formerly BATF) - a division of the Department of Treasury. The grouping of alcohol alongside tobacco reflects the history of alcohol issues in the United States, and the level of regulatory control that is the legacy of prohibition.

All wines sold in the USA must first obtain a Certificate of Label Approval (COLA) from the TTB. This can be applied for online at <https://www.colasonline.gov/colasonline/>.

## What do I have to have on the label?

There are six items of information that must appear on the label of a New Zealand wine exported to the USA. Three of these items – brand name, class or type designation and alcohol statement (items 1-3 below) – constitute what is called the “brand label”. In the past the brand label had to be the front label. However in recent years the TTB has become more flexible in its thinking. At the current time, the brand label is accepted as the label that contains all the information required to be on the brand label and which the winery identifies as being the brand label when the label approval application is filed with the TTB. This enables wineries to have a clean label containing key information (brand, geographical indication, vintage, variety) and then the “brand label” with all the required information. It is permitted to repeat mandatory information in other places on the label.

All mandatory information must be legible and on a contrasting background. If any of the mandatory information is contained among other descriptive information, then it should be of a size substantially more conspicuous than the descriptive information.

### 1. **Brand name**

All wine labels must bear a brand name. If it does not bear one, the name of the bottler, packer or importer becomes the brand name. The brand name must appear in “the usual distinctive design”. It must not convey an erroneous impression as to age, origin, identity or other characteristics of the wine. The brand name must be at least 2mm in height for a 750ml bottle.

This must appear on the same label as the class and type designation and the alcohol statement.

## **2. Alcohol statement**

All wines over 14% alcohol must bear a statement of alcoholic content. Wines of between 7% and 14% alcohol may either bear a statement of alcoholic content or use the type designation “table wine” or “light wine” (see below). The latter option is not desirable in most cases, however, since it effectively precludes the use of a grape variety on the label.

The alcohol statement must appear on the brand label in lettering of between 1mm and 3mm in height, and may not be set off with a border or emphasized in any way. The following forms of alcohol statement are acceptable: “Alcohol (Alc.) xx% by volume (vol.)” or “xx% alcohol (alc.) by volume (vol.)” or “Alc. xx% vol.”. The third version can also be used in the EU. Full stops must be used for the abbreviated version.

Tolerance from the actual alcohol content is +/-1.5% for wines 7-14%. There is a tax boundary at 14%, and the declared content may not be in a different tax category from the actual content. Over 14% the permitted tolerance is 1% between the declared and actual alcohol.

## **3. Class and type designation (varietal statement)**

All wine labels must bear a “class and type designation”. This can either be a generic description (e.g. “white wine”, “sparkling wine”, “Port”) or a varietal statement. If you have more than one item on a label that could be a class or type designation, the TTB will use the most specific item as the class and type designation (e.g. if you have both “Chardonnay” and “white wine” on a label, “Chardonnay” becomes the class and type designation and must therefore appear on the brand label). In most cases, therefore, the varietal statement will need to appear on the brand label. It must be in letters of at least 2mm in height for a 750ml bottle.

*NB: You can only use a variety name as the class and type designation, if your wine label also has an “appellation of origin” in accordance with the conditions below. This means that if you have a variety on the label, you must also have a geographical indication.*

The minimum content for a single grape variety is 75%. Multiple varieties may be used. In that case, all varieties must be stated, with the percentage of each variety in the blend also stated (e.g. “Cabernet Sauvignon 75%, Merlot 25%”). When the percentages are stated with the varieties on the brand label, they do not need to be repeated if the varieties are themselves repeated elsewhere on the label.

## **4. Volume statement**

All wine must bear an indication of net contents. This may appear on any label, and must be expressed in millilitres for a 750ml bottle.

## **5. *Importer statement***

All imported wine labels must bear the name and address of the importer. The form is: “Imported by [name of importer] [address of principal place of business].” The name should be that which appears on the importer’s basic permit. The address should be the city and state shown on the importer’s basic permit. This may appear on any label and must be in lettering of a least 2mm in height for a 750ml bottle. If the wine is bottled or packaged in the USA, different rules apply.

## **6. *Country of origin***

All imported wine labels must bear a country of origin statement. This may appear on any label. This requirement is found in the US Customs regulations. These regulations do not specify how the country of origin declaration should be presented. TTB guidelines indicate that “Product of New Zealand” is the preferred form. However, the TTB has now indicated that it will accept “New Zealand Wine” or “Wine of New Zealand”.

## **7. *Sulfite declaration***

All wines containing more than 10ppm sulphur dioxide must bear a sulphite declaration. This may appear on any label and must be in lettering of a least 2mm in height for a 750ml bottle. The required form is: “Contains Sulfites” (note the US spelling). However, the TTB has recently relaxed its position on the spelling of this declaration and will now accept “Contains Sulphites”.

The US is likely to bring in allergen labelling requirements for all foods in relation to fish, egg and milk products before 1 January 2006. It is also possible that some form of standard drinks declaration will be introduced in the USA, and that this will be measured differently from NZ declaration.

## **8. *Government warning***

All wine labels must bear a government alcohol warning. This must be at least 2 mm in height for a 750ml bottle, and must be in the following form:

**GOVERNMENT WARNING:** (1) According to the Surgeon General, women should not drink alcoholic beverages during pregnancy because of the risk of birth defects. (2) Consumption of alcoholic beverages impairs your ability to drive a car or operate machinery, and may cause health problems.

The first two words must be in bold and in capitals. The remainder of the statement must appear as a continuous paragraph and may not appear in bold. The number of type characters may not exceed 25 per inch for 2mm minimum type size.

## What optional information can I use on the label?

### ***Vintage***

A vintage date can only be used if the wine also has a geographical indication (called “appellation of origin”). The geographical indication used cannot be a country name, such as New Zealand.

The USTTB has issued a new ruling on minimum content required for the use of vintage dates on wine labels. Our interpretation of the rules is that, as of 2 June 2006:

- New Zealand wines labelled with a geographical indication that coincides with an NZ local government region or district must have at least **85%** wine from the stated vintage in order to use the vintage date on the label. Such geographical indications would include: Northland, Auckland, Waikato, Bay of Plenty, Gisborne, Hawke’s Bay, Central Hawke’s Bay, Wellington, Marlborough, Canterbury, Otago.
- New Zealand wines labelled with a geographical indication that does not coincide with a local government region or district must have at least **95%** wine from the stated vintage in order to use the vintage date on the label. Such geographical indications would include: Martinborough, Nelson, Central Otago, East Coast, North Island, South Island.

### ***Geographical indication***

*Geographical indication is a “controlling item” in the USA. You must have a geographical indication (other than “New Zealand”) on the label if you want to use a vintage date.*

A geographical indication (called “appellation of origin”) can be used on the label. It must be a name that is listed with the TTB as a New Zealand appellation of origin. These names are listed in Annex 2. The minimum content of wine from the stated appellation of origin is 75%.

If you are using a grape variety as your class & type designation (which will usually be the case for a varietal wine), the appellation of origin must appear in direct conjunction with, and in lettering substantially as conspicuous as, the class and type designation. “Direct conjunction” means on the same label and in the same field of vision.

### ***Producer’s name***

The name and address of the producer can be used on the label, in addition to the importers details. If used, the name and address must be accompanied by an appropriate explanatory phrase identifying the specific winemaking operation (e.g. “Produced by...”).

### ***Estate bottled***

The term “estate bottled” can only be used if 100% of the wine came from grapes grown on land owned or controlled by the winery, which must be located in the viticultural area that appears on the label. The producer must crush and ferment the grapes, finish, age and bottle the wine at the same winery in the stated viticultural area.

### ***Allergen statement***

Allergen statements are currently not mandatory on the labels of wine sold in the USA. However, an allergen statement is used, all allergens used in the production of the wine must be declared in the required form. The required form is to use the word “Contains” followed by a colon and the name of the food source from which each major food allergen is derived, e.g. “Contains: milk and egg.” You can use the same allergen statement for NZ as for USA if it is presented on the label in this form.

### ***Other information***

Labels may contain additional information provided that it does not conflict with or contradict mandatory information. Additional information must be truthful, accurate, specific and not disparaging of competitors' products, false or misleading.

### ***Prohibited information***

There is a fairly lengthy list of things that are prohibited on a US wine label, although most of it would not be relevant to the average New Zealand wine producer. Additional information must not be obscene or indecent; give the impression that a wine contains distilled spirits or has intoxicating qualities (!); give the impression it belongs to a different class and type (e.g. words such as “lively”); simulate any sort of Government stamp; make claims about curative or therapeutic effects etc.

### ***Standard drinks***

The NZ standard drinks declaration should not appear on a US wine label. It is not a legal requirement and the US calculates differently from NZ.

### ***Organic claims***

#### “100% Organic”

For a wine to be labelled “100% Organic” it must be made from 100% organically produced ingredients (in other words, the grapes must be grown organically) and the label must state who the certifying agency is (“Certified Organic by ---” or a similar phrase must be listed below the name and address of the importer). A wine in this category cannot have any added sulfites. It may have naturally occurring sulfites, but the total sulfite level must be less than 100 parts per million.

#### “Organic”

To be labelled “Organic” the wine must be made from at least 95% organic ingredient and give information about who the certifying agency is. Again, a wine in this category cannot have any added sulfites, but it is allowed to have naturally occurring sulfites below 100 parts per million. The nonorganic 5% must either be a nonorganically produced agricultural ingredient that is not organically available or another substance like added yeast.

“Made with Organic Ingredients - Made with Organic Grapes - Organically Grown”

To claim any of these statements, a wine must be made with at least 70% organic ingredients and give information about who the certifying agency is. A wine in this category may not bear the USDA seal. It may contain added and naturally occurring sulfites and the total must still be under 100 parts per million. The 30% of nonorganic ingredients must be nonorganically produced agricultural ingredients that are not available in an organic form or another substance.

“Some Organic Ingredients”

This category is for products that have less than 70% organic ingredients. It cannot bear the USDA seal nor have information about a certifying agency or any other reference to organic content.

The USDA accept the NZFSA's programme for recognition of organic certifying bodies. As such, organic products certified by an NZFSA recognised Third Party Agency (TPA) to the USDA National Organic Standards, are permitted entry into the US. At present these certifying bodies are Bio-Gro and Certenz.

# CANADA

## What laws apply to labelling in Canada?

Canada's labelling regulations are a little more liberal than those of the USA or the EU, however they are overlaid with a dual language requirement that is not applied in any other market. **All New Zealand wine exported to Canada must comply with Canadian labelling requirements, rather than New Zealand requirements.**

Canadian labelling requirements are found in the Consumer Packaging and Labelling Act and Regulations and the Canadian Food and Drugs Act and Regulations. A useful guide to their alcoholic beverages labelling regime can be found here:

<http://www.inspection.gc.ca/english/fssa/labeli/guide/ch10e.pdf>.

Alcoholic beverages can only be sold in Canada through the provincial Liquor Control Boards. Many Liquor Control Boards have a process for vetting the labels of any products that they sell. Some Liquor Control Boards will also have additional labelling or packaging requirements, as well as barcode and carton labelling requirements, which are not covered in this Guide.

## What do I have to have on the label?

There are six items of mandatory information that must appear on the label of a wine sold in Canada, as well as the dual language requirement. All but two of these items must appear on the "principal display panel", which Canadian authorities have interpreted as meaning the front label. A minimum type size of 1.6mm in height based on the lowercase letter "o" is specified for most mandatory information. Other mandatory information must be easily read and clearly and prominently displayed, and the 1.6mm standard is recommended.

### 1. **Common Name**

All wine labels must bear the term "wine" as the prescribed common name of the product. This must appear on the front label (i.e. the "principal display panel"), and must be in letters of at least 1.6mm in height based on the size of the lowercase "o" (even though there is no "o" in wine).

### 2. **Net contents**

All wine labels must bear a declaration of net contents. For quantities of less than 1 litre, this should be expressed in millilitres (e.g. **750** ml). The acceptable symbols are ml, mL and mℓ.

This should be placed on the front label (principal display panel), and must be clearly and prominently displayed, easily legible and in distinct contrast to any other information on the label. The numerical portion of the net contents declaration must be in bold and in a type size that is proportionate to the area of the principal display surface of the container – the larger the container, the larger the text must be. The "principal display surface" is the 40% of the surface

of the bottle where the front label appears. The symbols used in the net contents declaration (i.e. “ml”) must be at least 1.6mm in height based on the lowercase “m”.

The net contents declaration should technically be in English and French, although “750 ml” would be considered to be bilingual and does therefore not have to be repeated.

NB – wine can only be sold in Canada in standardized container sizes – i.e. 50, 100, 200, 250, 375, 500, 750 millilitres and 1, 1.5, 2, 3 or 4 litres.

### **3. Alcohol content**

All wine labels must bear a declaration of alcoholic content on the front label (principal display panel). The can appear as either “x% alcohol by volume” or “x% alc./vol.” (full stops must be used in the abbreviated version). The abbreviated version is considered to be bilingual and therefore does not need to be repeated. The minimum type size is 1.6mm based on the lowercase “o”.

There is nothing specific in Canadian Federal law about tolerances for the alcohol declaration, although this may be covered by the general provisions in Canadian food labelling laws related to misleading labelling. We understand that, in practice, the provincial liquor boards in Ontario and Quebec currently operate a tolerance of +/- 0.5%.

### **4. Producer’s name**

All wine labels must bear the name and principal place of business of the person by whom or for whom the wine was produced. The business identity is the registered name of the company. The principle place of business should include the city or town and the country. This may appear anywhere on the label. The minimum type size is 1.6mm based on the lowercase “o”. This may be shown in either English or French.

If you are using the name of a Canadian agent to meet the producer name requirements, then you must say “Imported by/Importé par <Agent’s identity etc.>” or “Imported for/Importé pour <Agent’s identity etc.>” or else use a geographical indication immediately adjacent to the Canadian agent’s details in type of the same size or larger.

### **5. Country of origin**

All wine labels must bear an indication of the country of origin on the front label (principal display panel). This must be in English and French and should appear as either “Product of New Zealand – Produit de Nouvelle-Zélande” or “New Zealand wine - Vin de Nouvelle-Zélande”. Wine must be grown and produced at least 75% in the stated country. There is no minimum type size requirement, but the 1.6mm standard is recommended.

### **6. Sulphite declaration**

Canada will bring in sulphite declaration requirements in late 2005. The declaration will be required in English and French, and the specified form will be either “contains sulphite/contient –

sulphite” or “contains sulphating agent/contient des sulphites”. They will not be requiring allergen declarations for fish, egg and milk products.

## **What optional information can I use on the label?**

As with every other country, the information on wine labels must be true and not misleading or deceptive. This applies to statements of vintage, variety and origin. However, no specific minimum content requirements exist for such statements in respect of imported wines.

There are also a range of specific conditions around using terms such as: fresh, natural, homemade, no preservatives, guaranteed, pure, genuine etc.

### ***Geographical indications***

Canada has historically allowed wine producers to use geographical names from other countries, provided that it was prefaced by a qualifier indicating the true origin (e.g. Canadian Champagne). Canada has recently signed an agreement with the EU to protect their geographical indications, and this practice is being phased out.

Canada does not have any specific minimum content requirements for variety, vintage or geographical origin (other than country of origin) in its national legislation. However, it does require that any information on the wine label must not be false, misleading or deceptive. As a guideline to what might be acceptable in Canada in this respect, the guidelines for Canadian Vintner’s Quality Alliance (VQA) wines are instructive. In the case of single-varietal VQA wines, where the variety is indicated on the principal display panel, not less than 85% of the wine shall be made from the named individual grape variety. In the case of dual-varietal VQA wines, where the varieties are indicated on the principal display panel, not less than 95% of the wine shall be made from the two varieties named, with the second being not less than 15% of the total. In every case, the declared varieties shall be listed on the principal display panel in descending order of quantity, in identical type and identically displayed.

### ***Standard drinks***

The NZ standard drinks declaration should not appear on a Canadian wine label. It is not a legal requirement and Canada calculates differently from NZ.

### ***Organic claims***

In order to make an organic claim in Canada, you must provide official assurance from your own Government that the product meets Canadian Organic Products Regulations 2006. The NZFSA’s organic programme does not currently extend to cover Canada.

# BRAZIL

## What laws apply to labelling in Brazil?

Brazilian labelling requirements are found in the Brazilian Consumer Protection Law number 8,078. The following information is drawn from the interpretation of that legislation provided by the United States Department of Agriculture as well as information provided by Market New Zealand. However, there are significant difficulties involved in interpreting and translating these standards and we strongly advise caution in applying the following information. **You should consult your agent in the relevant market to confirm the requirements before labelling your wine.**

Once the product reaches Brazil, in order to clear customs, imported wines are subject to chemical analysis to verify that they meet international requirements. Port authorities working for the Ministry of Agriculture will take one sample for analysis. The Brazilian importer will deposit the imported merchandise in storage until the laboratory test results are confirmed.

## What do I have to have on the label?

United States Department of Agriculture reports state that it is common practice in Brazil for importers, agents, or distributors to affix to the wine bottle an additional small adhesive label in Portuguese, with the name and address of the importer, and the company's tax registration number. The following information must also appear on the label:

- Name of product;
- Country of origin;
- Alcohol content;
- Net volume (in metric units);
- Validity date (shelf life);
- Date of production; and
- Food Additives (if any)

Wine and the winery producing the wine exported to Brazil must be registered with the Office of Agricultural Protection (SDA) of the Ministry of Agriculture (MAPA). The importer normally handles this process. It is highly advisable that exporters work with competent and reputable importers who are familiar with Brazilian import regulations for wines.

## CHINA

### What laws apply to labelling in China?

The key items of labelling legislation are the wine standard (GB 15037) and the wine labelling law (GB 10344) both of which are administered by the General Administration of Quality Supervision, Inspection and Quarantine of the People's Republic of China. The following information is drawn from those standards and from the interpretation provided on the website of the Australian Wine and Brandy Corporation as well as information provided by Market New Zealand. However, there are significant difficulties involved in interpreting and translating these standards and we strongly advise caution in applying the following information. **You should consult your agent in the relevant market to confirm the requirements before labelling your wine.**

Chinese law bans the use of temporary adhesive labels, although some foreign wineries continue to attach small and simple labels (translated into Chinese) on the outside of the bottle. This is done either prior to delivery to China or by the Chinese importer under the supervision of a Chinese inspection and quarantine organisation. This is a risky option to take and, as such, New Zealand Trade and Enterprise recommends that exporters strictly abide by the formal labelling regulations when developing business in China.

On arrival, individual shipments are inspected and issued a hygiene certificate if they pass. Products that fail inspection cannot be imported.

### What do I have to have on the label?

There are nine items of mandatory information that must appear on the label of a wine sold in China.

#### **1. Name of Product**

The name of the product is mandatory in China. The words 'grape wine' should be sufficient, however it is advisable to qualify this with 'red', 'white', 'sparkling', 'semi-sparkling', 'fortified', 'sweetened fortified' etc. The minimum type size is 1.8mm. This may appear on any label.

#### **2. Ingredient List**

As wine can be considered to be made from a single raw material it should be exempt from the requirement for ingredient listing. Nevertheless, sweeteners, preservatives and added colour (legal in the case of fortified wine only) need to be declared. The name of the substance (sulphur dioxide, sorbic acid, caramel etc) should be declared rather than the generic category, for example, 'preservative' or 'colour'. Added acids should also be declared. The minimum type size is 1.8mm. This may appear on any label.

### **3. Alcohol Statement**

The alcohol format is prescribed in Chinese regulations. The alcohol statement should be in the form 'Alcoholic strength xx.x% vol'. (Apparently % Mass is also acceptable and this may account for some of the reported disparity between results obtained from testing authorities within China). The tolerance between the actual and the stated alcohol is +/- 1.0% in China. The minimum type size is 1.8mm. This may appear on any label.

### **4. Volume Statement**

The volume statement must be on the same display panel as the word 'wine'. This should be marked as 'net content xxx MI (ml)' for bottle sizes under a litre, or 'net content x Litres (l)' for bottle sizes over a litre. For packages up to and including 200ml the minimum print height is 3mm. From 200ml up to and including 1 litre the minimum print height is 4mm. For packages greater than 1 litre the minimum print height is 6mm.

### **5. Name and Address**

The name and address of the Chinese agent, importer or distributor must be shown on the label. The name and address of the producer is not mandatory, however if included does not need to be translated into Chinese characters. The minimum type size is 1.8mm. This may appear on any label.

### **6. Country of Origin**

A country of origin statement is mandatory. Importers will usually request a Certificate of Origin to confirm this claim. Certificates of Origin can be obtained by state Chambers of Commerce. The minimum type size is 1.8mm. This may appear on any label.

### **7. Bottling Date**

The date of bottling is required on Chinese labels. The minimum type size is 1.8mm. This may appear on any label.

Compliance with this requirement could be extremely difficult as the standard batch or lot labelling using the Julian date code does not appear to be acceptable to the Chinese. Neither can the bottling date be applied in the form of a sticker, reprint or tampering which suggests that the label itself must contain the required information. We suggest that negotiation with your bottler is required in order to satisfy this traceability requirement.

### **8. Minimum Durability Date**

Wines with an alcohol content of 10% or less are required to include a minimum durability date. The minimum type size is 1.8mm. This may appear on any label. Wines over 10% alcohol are exempt from this requirement (GB7718-5.2.1 and GB10344-5.2). Nevertheless many importers and/or regulatory authorities seem unaware of this exemption and it is advisable to include a statement such as 'recommended to drink before (year)'.

## 9. **Product Type**

The product type is mandatory for China. This can be indicated by the actual sugar content or by the category. The following categories apply:

### *Dry wines*

Wines with a sugar content (measured by grape glucose) less than or equal to 4.0g/l; or wines with a maximum sugar content of 9.0g/l when the difference between total sugar and total acids (measured by tartaric acids) is less than or equal to 2.0g/l.

### *Semi-dry wines*

Wines with a sugar content greater than that of dry wines or with a maximum sugar content of 12.0g/l; or wines with a maximum sugar content of 18.0g/l when the difference between total sugar and total acids (measured by tartaric acids) is less than or equal to 2.0g/l.

### *Semi-sweet wines*

Wines with a sugar content greater than that of dry wines or with a maximum sugar content of 45.0g/l.

### *Sweet wines*

Wines with a sugar content greater than 45.0g/l.

### *Still wines*

Wines with carbon dioxide pressure of less than 0.05 MPa at 20°C.

### *Sparkling wines*

Aerated wines with carbon dioxide (completely produced by natural fermentation) pressure greater than 0.35 MPa at 20°C (for bottles with a capacity of less than 250 ml and with carbon dioxide pressure greater than or equal to 0.3 MPa).

— Brut sparkling wines: sparkling wines with a sugar content of less than or equal to 12.0g/l (tolerable deviation: 3.0g/l).

— Extra-dry sparkling wines: sparkling wines with a sugar content within the range of 12.1-17.0g/l (tolerable deviation: 3.0g/l).

— Dry sparkling wines: sparkling wines with a sugar content within the range of 17.1-32.0g/l (tolerable deviation: 3.0g/l).

— Semi-dry sparkling wines: sparkling wines with a sugar content within the range of 32.1-50.0g/l.

— Sweet sparkling wines: sparkling wines with a sugar content greater than 50.0g/l.

### *Semi-sparkling wines*

Aerated wines with carbon dioxide (completely caused by natural fermentation) pressure within the range of 0.05-0.34 MPa at 20°C.

### *Liqueur wines*

Wines made from grapes, with a total alcohol content of above 12% (volume fraction), with the addition of grape brandy, edible alcohol or wine essence, grape juice, grape juice concentrate, caramel grape juice, white sugar, etc, so that the final product has an alcohol content of 15.0-22.0% (volume fraction).

### *Carbonated wines*

Wines whose carbon dioxide is partially or completely added artificially, and which have similar physical properties to those of aerated wines.

### *Ice wines*

Wines made from frozen grapes which are kept hanging on the branches at below -7°C for a certain period of time, and then picked for pressing and fermentation (no sugar source may be added in the wine-making process).

### *Noble rot wines*

Wines made from grapes which are infected with *Botrytis cinerea* in the later stages of the ripening period, as a result of which obvious changes have occurred to the ingredients of the fruits.

## **What optional information can I use on the label?**

The new Chinese wine standard which will shortly come into force sets out the following requirements for vintage, variety and origin labelling:

### ***Vintage***

A vintage may be used provided that the wine comprises at least 80% wine from the stated vintage.

### ***Grape variety***

A grape variety may be used provided that the wine comprises 75% from the stated variety.

### ***Geographical origin***

An indication of geographical origin may be used provided that the wine comprises at least 80% from the stated origin.

# JAPAN

## What laws apply to labelling in Japan?

Wine for sale must comply with the labelling standard regulations based on the Law Concerning Liquor Business Association and Measures for Securing from Liquor Tax, the Food Sanitation Law, and the Measurement Law. For imported wines, both importing and wholesaling companies are responsible for indicating the following on product labels.

## What do I have to have on the label?

There are eight items of information that must appear on the label of a bottle of wine sold in Japan. There are no specific placement requirements, although certain items of information must appear together. Information on the label must be in Japanese, although non-mandatory items may also appear in English.

### **1. Name of Product**

This should be a common name, such as “wine”. The minimum type size is 2.8mm. This must appear collectively with alcohol content, country of origin, food additives, carbonation statement.

### **2. Alcohol Content**

This should be rounded to the nearest percentage point and be expressed as follows: “x degrees or more to less than y degrees alcoholic content”. The different between x and y must be no more than 1 degree of alcoholic content. So, for example, a wine with 12.6% alcohol should be labelled: “12 degrees or more to less than 13 degrees alcohol.” The minimum type size is 2.8 mm. This must appear collectively with product name, country of origin, food additives, and carbonation statement.

### **3. Food Additives**

The names of any food additives should be shown in descending order of proportion by weight. Relevant additives are preservatives or antioxidants, which should be listed preceded by the word “preservative” or “antioxidant”. The minimum type size is 2.8 mm. This must appear collectively with product names, alcohol content, country of origin, carbonation statement.

### **4. Net Contents**

This can be expressed in either millilitres or litres. The minimum type size is 2.8 mm.

### **5. Carbonation statement**

A statement is required as to whether or no a wine is carbonated. The minimum type size is 2.8 mm. This must appear collectively with product name, alcohol content, country of origin, food additives.

## **6. Country of Origin**

This can be done in the usual form – e.g. “New Zealand Wine”. The minimum type size is 2.8 mm. This must appear collectively with product name, alcohol content, food additives, and carbonation statement.

## **7. Importer/Distributor Name and Address**

The name and address of the importer must appear on the label. Details must be sufficient to allow a consumer to contact the importer. If the distributor is different from the importer, the distributor’s details should also appear. The minimum type size is 2.8mm.

## **8. Consumption by minors**

All wine labels should bear one of the following statements: “Consumption of alcohol by minors is prohibited” or “Alcohol may only be consumed by those 20 or over”. The minimum type size is 2.8mm.

You should also note that there is a voluntary industry standard in Japan specifying health warnings for pregnant and breast-feeding women. Your importer may request this be included on your label. The minimum type size is 2.8mm.

## **What optional information can I use on the label?**

### ***Organic claims***

In order to be certified organic in Japan, your product must meet the requirements of the Japan Agricultural Standards (JAS) law. New Zealand producers can arrange to be certified in New Zealand under the NZFSA’s organic programme, which is recognized by JAS.

## OTHER ASIAN COUNTRIES

We have included below information on the labelling requirements of several key Asian markets. This information is not as detailed as that provided for other markets, due to the difficulty of obtaining up to date and accurate material from these markets. It is intended to give you an overview of the sorts of labelling issues you will need to consider when exporting to those markets. **You should consult your agent in the relevant market to confirm the requirements before labelling your wine.**

This information is taken directly from the acknowledged sources, largely without commentary from us. Where we have commented, this appears in italics. Our key source is the excellent set of market reports provided courtesy of New Zealand Trade and Enterprise's Market New Zealand service. We highly recommend that you register with [www.marketnewzealand.com](http://www.marketnewzealand.com) to access the full text and latest versions of these reports which contain a wealth of valuable information.

### Hong Kong

Source: [www.marketnewzealand.com](http://www.marketnewzealand.com) April 2005

Wine or alcoholic drinks with an alcoholic strength by volume of 10% or more as determined under section 53 of the Dutiable Commodities Ordinance (Cap 109) (L.N. 85 of 2004; L.N. 139 of 2004) are exempted from Schedules 3 of the Food and Drugs (Composition and Labelling) Regulations except paragraph 3 (see details on the website [www.fehd.gov.hk/safefood/foodlaw\\_cl.html#6](http://www.fehd.gov.hk/safefood/foodlaw_cl.html#6)).

*In effect, this appears to mean that the general food labelling standards do not apply to wine, although there is a requirement for an alcohol declaration in other legislation. Nevertheless, it is very likely that importers/distributors will have their own additional requirements for wine labels.*

### Korea

Source: [www.marketnewzealand.com](http://www.marketnewzealand.com) April 2005

Importers must obtain a license from the regional tax office to import alcoholic beverages including wine. The import of wine is not restricted in Korea, but is subject to inspection by the Korea Food & Drug Administration (KFDA).

For any initial shipment into the market, a close inspection usually takes 18 days. Inspections of subsequent shipments usually take three to four days if the product is identical in label, product name, alcoholic content, vintage and bottle size. The KFDA also test whether the alcohol content maintains a 0.5% tolerance level between the labelled and actual alcoholic content.

It is compulsory for imported wine to carry a Korean language label. Stickers may be used but should not be easily removable, or cover the original labelling. Basically, labels should have the following printed in letters large enough to be read:

- product type and name;
- country of origin;
- alcohol percent and volume;
- name and volume of ingredients by percentage;
- name of food additives;
- instructions for storage;
- importer's name, address and phone number;
- business license number of importer;
- bottling date;
- address where products may be returned or exchanged in the event of defects;
- health warning clause;
- distribution channel (i.e. for home use, for duty-free shop, for discount stores).

Korean food importers can prepare labels in Korean and stick to bottles in a bonded warehouse in Korea prior to customs clearance.

Labelling standards and import requirements can change frequently in Korea and are controlled by the KFDA. Close contact with a Korean importer is essential to obtain the latest information on requirements.

## Thailand

Source: [www.marketnewzealand.com](http://www.marketnewzealand.com) *April 2005*

Imports of alcoholic beverages including wine are under the responsibilities of The Excise Department (EXD) and The Customs Department. The EXD's responsibilities include labelling, licensing, and product quality control.

In 2003, the Ministry of Public Health put in place new requirements for a health warning on individual bottles. They are:

- The label must be in Thai, legible, bold letter at least 5 mm height, fit in a box, the colour of the box edge and letters must contrast with the background.
- The label/sticker must contain the following health warnings:
  - ◇ No sale to children under 18 years.
  - ◇ Drinking spirits can lessen control.
  - ◇ Children under 18 years should not drink.

## Malaysia

Source: [www.marketnewzealand.com](http://www.marketnewzealand.com) August 2004

The Malaysian Ministry of Health legislates on labelling, including the design and label contents. A font size of 12 must be used to inform Muslims that it is an alcoholic drink and not for their consumption.

## India

The key items of labeling legislation are the Prevention of Food Adulteration Rules 1955 and the Standards of Weights and Measures (Packaged Commodities) Rules 1977.

The following mandatory information must appear on the Principal Display Panel (for cylindrical containers the PDP must cover at least 20% of the height and circumference of the container, neck not included) in either English or Hindi in Devnagri script:

- name of product;
- ingredient list;
- name and address of manufacturer and importer;
- volume statement;
- lot number; and
- packaging date.

Also mandatory, the following information may appear anywhere on the label:

- alcohol statement (no prescribed format – you may use the New Zealand calculation method); and
- country of origin.

The minimum print height is 1mm, however the volume statement, lot number and packaging date must be at least 4mm. Mandatory information must be legible, prominent, definite, plain, unambiguous and conspicuous. Vintage, variety and geographical indication claims are optional.

Ingredients must be listed in descending order of their composition by weight or volume. If gelatine is used as an ingredient, the following declaration must be included: “Gelatine – Animal Origin.” Antioxidants and preservatives must be declared and prefaced with the word “Antioxidant” or “Preservative”.

If the wine contains any animal products including birds, eggs or fish (but not including milk or milk products) a symbol indicating that the product is non-vegetarian must be included on the label. The symbol is a brown circle inside a square with a brown outline (the square must be twice the diameter of the circle):



<b>Area of Principal Display Panel (PDP)</b>	<b>Minimum Diameter</b>
Up to 100 cm square.	3 mm
100 cm square to 500 cm square	4 mm
500 cm square to 2500 cm square	6 mm
Above 2500 cm square.	8 mm

The symbol must be displayed in close proximity to the PDP on a contrasting background and should be included on any associated containers, pamphlets, leaflets or advertising material.

A similar symbol is required for vegetarian food – a green circle inside a green square. The display requirements are the same as for the Non-vegetarian symbol.

## **Taiwan**

It is compulsory for imported wine to carry a Chinese language label. Stickers may be used but should not be easily destroyed or damaged. Labels should include the following mandatory information printed clearly and legibly:

- brand name (may be in English);
- product type;
- country of origin;
- alcohol statement (must be labeled by degrees eg XX% vol);
- health warning;
- importer's name and address;
- lot number (imported wine harvested and produced only once a year should adopt its date of manufacture as its lot number); and
- sulphur dioxide statement (wine containing more than 250mg/L but less than 400 mg/L of sulphur dioxide must be labeled: 'this product contains less than 400 ppm of sulphur dioxide').

Vintage, variety and geographical indication claims are optional. If wines of different ages are blended, the label can only refer to the youngest one.

## Annex 1 – Geographical Indications for use in the USA

The following is the list of GIs approved for use on NZ wines in the USA. To have terms added to the list is a lengthy process - in the first instance terms should be forwarded to John Barker at Winegrowers.

<b>New Zealand</b>	Mangere	Tamahere	<b>Hawkes Bay</b>
<b>North Island</b>	Matakana	Te Kauwhata	Bay View
<b>South Island</b>	Matua Valley	Thames	Clive
<b>East Coast</b>	Oneroa		Crownthorpe
	Onetangi	<b>Bay of Plenty</b>	Dartmoor
<b>Northland</b>	Oratia	Bethlehem	Dartmoor Valley
Dargaville	Pukekohe	Galatea	Eskdale
Kaikohe	Putiki Bay	Katikati	Fernhill
Kaitaia	Ranui	Murupara	Flaxmere
Kerikeri	Riverhead	Rotorua	Gimblett Road
Kohukohu	Riverlea	Tauranga	Greenmeadows
Otaika	Sunnyvale	Thornton	Haumoana
Raumanga	Swanson	Whakatane	Havelock North
Ruakaka	Swanson Valley		Heretaunga
Sweetwater	Taupaki	<b>Gisborne</b>	Korokipo
Te Hana	Waiheke	Bushmere	Mangatahi
Whangarei	Waiheke Island	Hexton	Maraekakahoe
	Waimauku	Makaraka	Meeanee
<b>Auckland</b>	Waitakere	Makauri	Mere Road
Brighams Creek	Warkworth	Manutuke	Mt Erin
Clevedon	West Auckland	Matawhero	Napier
Drury	Whitford	Mohaka	Ngatarawa
Glendene	Woodhill	Muhaka	Ngaruroro
Great Barrier Is.		Muriwai	Ohiti
Henderson	<b>Waikato</b>	Ormond	Ohiti Road
Henderson Valley	Cambridge	Ormond Valley	Okawa
Hobsonville	Hamilton	Patutahi	Omarunui
Huapai	Karangahake	Te Araroa	Pakuratahi Valley
Huapai Valley	Mangatawhiri	Te Karaka	Puketapu
Ihuamato	Ngahinepouri	Tolaga Bay	Roy's Hill
Karaka	Ohaupo	Waihirere	Roys Hill
Kumeu	Paeroa	Waimata	Sherenden
Lincoln	Pokeno	Wairoa	Swamp Road
Mangatangi	Pukeroro		Taradale

Te Awanga	Lower Wairau	<b>Canterbury</b>	Lowburn
Tuki Tuki	Marshlands	Akaroa	Luggat
Tutaekuri	Omaka	Amberley	Omarama
Twyford	Omaka Valley	Banks Peninsula	Queenstown
Waiohiki	Raupara	Burnham	Roxburgh
Wharerangi	Renwick	Christchurch	Tarras
Woodthorpe	Riverlands	Coutts Island	Waitaki Valley
	Spring Creek	Halswell	Wanaka
<b>Wanganui</b>	Waihopai	Kaiapoi	
	Waihopai Valley	Kaituna Valley	
<b>Wellington</b>	Wairau	Lansdowne	
East Taratahi	Wairau Valley	Larcomb	
Gladstone	Woodbourne	Lincoln	
Kapiti		North Canterbury	
Longbush	<b>Nelson</b>	Omihi	
Martinborough	Appleby	Omihi Hills	
Masterton	Atawhai	Omihi Valley	
Otaki	Brightwater	School Road	
Pirinoa	Burkes Bank	Selwyn	
Ponatahi	Clifton	Swannanoa	
Taratahi	Golden Bay	Taitapu	
Te Horo	Hope	Tram Road	
Te Muna	Lower Moutere	Two Chain Road	
Tuhitarata	Mahara	Waipara	
Waingawa	Mariri	Waipara Valley	
Wairarapa	Motueka	West Melton	
	Motueka Valley		
<b>Marlborough</b>	Moutere	<b>Otago</b>	
Awatere	Rabbit Island	Alexandra	
Awatere Valley	Redwood Valley	Ardgau Valley	
Benmorven	Richmond	Bannockburn	
Blenheim	Ruby Bay	Bendigo	
Conders Bend	Stoke	Central Otago	
Dillons Point	Tasman	Cromwell	
Dillons Point	Upper Moutere	Dunstan	
Road	Waimea	Earnscleugh	
Fairhall	Waimea Plains	Ettrick	
Fairhall Valley	Wakapuaka	Gibbston	
Hawkesbury	Wakefield	Hawea	
Koromiko		Lake Hayes	

## Annex 2 - EU Sulphite Declarations

The following list provides an indication based on the best information we have to date about the forms of sulphite declaration that will be acceptable in various EU Member States. The acceptable languages are as advised by the EU, although the specific wording should be verified with your agents in the relevant country as there are no official translations available and we have no way of knowing if these are correct or not.

MEMBER STATE	TRANSLATION
Austria	German ( <i>Enthält Sulfite</i> )
Belgium	Dutch ( <i>Bevat sulfieten</i> ) English ( <i>Contains Sulphites</i> ) French ( <i>Contient sulfites</i> ) German ( <i>Enthält Sulfite</i> )
Cyprus	Greek ( <i>Περιέχει θειώδη</i> )
Czech Republic	Czech ( <i>Obsahuje sířčitany</i> )
Denmark	Danish ( <i>Indeholder sulfiter</i> ) Swedish ( <i>Innehåller sulfiter</i> )
Estonia	Any EU language (NB Estonian = <i>Sisaldab sulfiidid</i> )
Finland	Finnish ( <i>Sisältää sulfitteja</i> ) Swedish ( <i>Innehåller sulfiter</i> ). Swedish can be replaced by Danish or Norwegian.
France	French ( <i>Contient sulfites</i> ) English ( <i>Contains Sulphites</i> )
Germany	German ( <i>Enthält Sulfite</i> )
Greece	Greek ( <i>Περιέχει θειώδη</i> )
Hungary	Hungarian ( <i>Tartalmaz szulfitok</i> )
Ireland	English ( <i>Contains sulphites / Contains sulfites</i> )
Italy	Italian ( <i>Contiene solfiti</i> )
Latvia	Latvian ( <i>Satur sulfīti</i> )
Lithuania	Lithuanian ( <i>Sudėtyje yra sulfitai</i> )
Luxembourg	French ( <i>Contient sulfites</i> ) English ( <i>Contains sulphites</i> ) Lux
Malta	Maltese ( <i>Fih sulfiti</i> ) English ( <i>Contains Sulphites</i> ) Italian ( <i>Contiene solfiti</i> )

Poland	Polish ( <i>Zawiera siaraczyny</i> )
Portugal	Portuguese ( <i>Contém sulfitos</i> ) English ( <i>Contains Sulphites</i> ) Spanish ( <i>Contiene sulfitos</i> ) French ( <i>Contient sulfites</i> )
Slovakia	Slovakian ( <i>Obsahuje siřičitany</i> )
Slovenia	Slovenian ( <i>Vsebuje sulfiti</i> )
Spain	Spanish ( <i>Contiene sulfitos</i> ) Portuguese ( <i>Contém sulfitos</i> ) English ( <i>Contains Sulphites</i> ) French ( <i>Contient sulfites</i> ) Italian ( <i>Contiene solfiti</i> )
Sweden	Swedish ( <i>Innehåller sulfiter</i> ) English ( <i>Contains Sulphites</i> )
The Netherlands	Dutch ( <i>Bevat sulfieten</i> )
United Kingdom	English ( <i>Contains Sulphites / Contains sulfites</i> )