



New Zealand Wine
the riches of a clean green land

NEW ZEALAND WINEGROWERS
Record Keeping Code of Practice:
Wine Making

July 1999 - Revised and Updated September 2006

INTRODUCTION

This Code of Practice has been developed by the New Zealand Winegrowers as a guide to record keeping for New Zealand grape wine makers.

The focus is on wine making and related records. Business records such as those required by IRD and NZ Customs are not addressed.

The purpose of the Code is to identify those records that makers of wine for export must keep in order to satisfy the Export Eligibility Requirements proscribed under the Wine Act 2003. It also suggests the detail that may need to be included in a record keeping system (they may be either computer or paper based systems).

The requirement to keep accurate records is vital to upholding and enhancing the reputation of New Zealand wine makers as producers of quality, integrity and high ethical standards. These are values that will enhance the long term development of New Zealand wine as a generic 'brand'. Compliance with these standards will benefit all winemakers

All New Zealand wine makers will soon be required under the Wine Act 2003 to maintain a fully traceable record keeping system. This Code of Practice will provide useful guidance in developing and maintaining such a record system. It is currently a requirement that all the wine exporters maintain a record keeping system based on this Code.

MANDATORY REQUIREMENTS

The Wine (New Zealand Grape Wine Export Eligibility Requirements) Notice 2006 sets out the mandatory record keeping requirements that must be met by all wine makers producing wine for export.

Record keeping requirements

Winemakers must document and maintain records for wine and winemaking inputs that enable:

- grapes used to make that wine to be tracked from vineyard of origin through to sale of wine; and
- wine in a particular package to be traced back to the source vineyards of the grapes from which that wine was made; and
- all other winemaking inputs to be identified; and
- the truthfulness and accuracy of any label statements regarding wine variety, vintage, area of origin, and country of origin to be determined; and
- where relevant, compliance with applicable labelling requirements under the New Zealand (Australia New Zealand Food Standards Code) Food Standards 2002 to be demonstrated.

Winemakers must maintain records to provide auditable trails for wine and grapes and other winemaking inputs that are based on product coding that enables individual wines as submitted for export eligibility approval to be separately and clearly identified.

Accessibility of records

Records must be:

- accessible to the auditor or a person authorised by the New Zealand Food Safety Authority; and
- retained for a period of at least 7 years; and
- retrievable within 2 working days or other period as determined by the auditor or the New Zealand Food Safety Authority.

RECOMMENDED PROCEDURES

The records that need to be kept by each winery to meet the Mandatory Requirements of this Code will vary depending on a number of factors including the source of grapes (contract or winery owned), the claims made on wine labels etc.

New Zealand Winegrowers recommends the following as indicative record keeping procedures that will enable the Mandatory Requirements of the Code to be met. It describes the records to be kept at each stage of the grapegrowing and winemaking processes. NB – the following are not mandatory requirements.

NB: In the following, wine includes unfermented must and juice.

Vineyard

Own vineyards - the location of supplying vineyards (including regional designation) should be recorded. A plan of the vineyard should be held recording the location of vines by variety (clone if available) and age.

Contracted grapes – the location and name of the owner of supplying vineyards (including regional designation) should be recorded. Vineyard owners should provide wineries with a plan of the vineyard providing information on the location of vines, by variety (clone if available) and age, which are the source of purchased grapes.

Pre – Harvest: Spray Diary

A complete spray diary should be kept in respect of all grapes processed at a winery; this includes contracted grapes. This spray diary is an integral component of the record system.

Harvest

At harvest the following should be recorded:

- Variety (clonal identity if known) and vineyard origin referenced to the vineyard plan (refer 'Vineyard' above)
- The method of harvest (machine or hand)
- Date of harvest.
- Basic chemical composition including brix, titratable acidity, pH and, if added in the field, sulphur dioxide
- Quantity of grapes (actual or estimated)
- Proof of purchase (if applicable)

Winery Layout

All containers (ie tanks, barrels etc) capable of holding wine/juice should be separately identifiable (ie numbered). The capacity of each tank should be recorded. Groups of barrels used for holding an individual batch can be recorded as one container.

If possible there should be a plan of the winery detailing the location of each container (NB this may not be possible in some wineries as tanks are moved around/in and out of the winery on an as needed basis.)

Juice/Wine Movements

The movement of juice/wine in the winery (ie tank to tank, tank to barrel etc) should be recorded by reference to the container numbering system (see 'Winery Layout' above), date and purpose of the movement. Movement of juice/wine within a group of barrels holding a batch does not need to be recorded.

Initial Litreage

The initial litreage of juice should be recorded at the first opportunity, generally immediately post-crushing/pressing etc.

Subsequent Litreage

Litreage should be re-measured at subsequent points during winemaking following addition of additives or winemaking procedures that lead to meaningful change in the juice/wine volume.

Additives

All additives added to grapes, juice, wine should be recorded by reference to:

- Volume added
- Date of addition
- Container number (see 'Winery Layout' above)
- Any chemical analysis conducted pre/post the addition

Processes

All processes carried out on the grapes, juice, wine should be recorded by reference to:

- Nature of the process

- Date of the process
- Any chemical analysis conducted pre/post the process

Blending

Blending of wines should be recorded by reference to the originating wines (and the containers from which they were sourced), the composition of the blend, the destination container(s) of the blend, any additives added during blending, and date of blending.

Packaging/Bottling

At packaging the following should be recorded (see also 'Additives' and 'Processes' above):

- Any pre-packaging processes/additives
- The identity and source of all dry goods
- Processes/additives used during packaging
- Date or other time, depending on winery definition of lots
- Composition – alcohol content, residual sugar, acid, pH, sulphur dioxide, sorbic acid (if used)

Post-Bottling Reconciliation

Following packaging, it is desirable (although not necessary) that a reconciliation should be conducted between the initial litreage recorded and the volume of wine packed, after taking into account the additives and processes used during winemaking. However the difficulties of doing this accurately are recognised.

Storage (including unlabelled product ie clean skins)

Wine stored post packaging/pre dispatch should be stored with reference to wine name, lot number and date of packaging. On bins holding unlabelled product the code/description identifying the bin must be indelible so that it can not be erased accidentally.

Dispatch

At dispatch of a particular wine, including bulk and packaged but unlabelled wine (ie clean skins) the following should be recorded:

- Package size and quantity

- Identity and address of the customer (including a separate billing/delivery addresses if these are different)
- Whether an export, home consumption entry, or interwinery transfer
- Lot number
- Date

Export

Documentation sent to the Wine Export Certification Service should be retained, in particular Tank Sample Verification forms and Application for review forms.

Inter-Winery Transfers

Movement of bulk wine and packaged but unlabelled wine (ie clean skins), needs to be recorded by both selling¹ and purchasing wineries. Purchasing wineries need to record the wine entering the winery on a similar basis to grapes entering the winery eg

- Volume and package type (if applicable)
- Source winery
- Variety(ies) (clonal composition if available) and vintage
- Date of purchase
- Basic chemical composition eg alcohol content, residual sugar, acid, pH, sulphur dioxide, sorbic acid (if used)

The contract between the selling and purchasing wineries should clearly establish the identity and composition of the traded wine. The contract should specify that the wine has been made in accordance with relevant New Zealand legislation.

Returned Product/Recall

Product returned from the market, including recalled product, should be recorded by reference to:

- Lot number
- Volume
- Date of return
- Reason for return
- Any analysis conducted on the returned product
- Fate of returned product
- Other relevant information

Contract Winemaking, Packaging and Labelling

Wineries who utilise contract winemaking, packaging and/or labelling services should keep the records described in this Code. Winemakers employing such services should require the contractor supplying the services to supply the information necessary to keep the records described.

¹ For selling wineries see 'Dispatch' above

AUDIT

Records required under this Code will be audited on a yearly basis, or as otherwise required by the New Zealand Food Safety Authority.

Export certification documents will not be provided to wineries unless audit statements are filed with the New Zealand Food Safety Authority.

Further information on export certification audit requirements is available from the Export Certification Service.

APPENDIX 1 – NZ LABELLING REQUIREMENTS

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 (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.

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). 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. It 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. This has certain implications for variety, vintage and origin statements, which are discussed below.

Grape variety, vintage and origin

If you want to use a grape variety on a wine label, the wine must contain at least 75% of the stated variety. If more than one variety is stated on the label, then the wine must contain at least 75% of the stated varieties (Food (Safety) Regulations 2002). There are no minimum percentages currently specified for statements of vintage or origin. The Fair Trading Act also applies to statements about variety, vintage and origin.

The New Zealand Food Safety Authority has proposed new standards for vintage variety and origin labelling under the Wine Act which take a more realistic approach. It has proposed an 85% minimum content for variety, vintage and origin labelling. The new standards will be passed into law in the near future.