



WINE LABELLING: WHERE DO WE STAND?

As part of the CAP reform, European Regulation 2021/2117 on the labelling of wines and alcoholic beverages has been accepted and will come into force on December 8th 2023. This requires the presence of new information in addition to the rules already in force concerning the listing of sulphites and other allergens. So what can we expect?



Good to know:

The European institutions have decided that wines produced before December 8th 2023 will not be affected by labelling.



WHAT INGREDIENTS SHOULD BE LISTED?

The list of ingredients must include raw materials such as grapes, sugar or concentrated must if added, as well as additives associated with their technological role, as defined in Regulation (EU) 2019/934. The presence of allergenic processing aids will be indicated in bold in the list. On the other hand, processing aids containing additives to preserve/stabilise the oenological product itself will not be labelled.

Ingredients are listed in descending order of weight when they represent more than 2% of the finished product; the order is therefore irrelevant for additives.

It should be noted that sulphur dioxide [E220], potassium metabisulphite [E224] and potassium bisulphite [E228] may be grouped together under the term “preservatives (sulphites)”. With regard to the “acidity regulators” and “stabilisers” categories, **similar or substitutable products** may be indicated in the list of ingredients using the expression “contains... and/or” followed by a maximum of three additives, at least one of which is present in the final product. The gases used during bottling (carbon dioxide, argon and nitrogen) may be replaced by the words “bottled in a protective atmosphere” or “bottling may be carried out in a protective atmosphere”. For sparkling wines, “liqueur de tirage” and “liqueur d’expédition” may be mentioned on their own, without listing their constituents.

Ingredient list example:

Ingredients: grapes, acidity regulator [L-tartaric acid], antioxidant [L-ascorbic acid], preservatives [sulphites], stabilisers [gum arabic], stabilisers [carboxymethylcellulose and/or metatartaric acid and/or mannoproteins].



UNDER WHICH FORMAT?

The list of ingredients can appear either physically on the back label or via electronic labelling. Platforms (e.g. u-label, vin.co, dansmabouteille, etc.) have already been developed to generate QR codes that can be added to labels, taking up less space than a full list.



The collection or tracking of user data will not be authorised, and the list must be kept separate from any other information for commercial purposes.

WHAT ABOUT NUTRITIONAL DECLARATIONS?

The list of ingredients will have to include raw materials such as grapes, sugar or concentrated must if the energy value is the only compulsory nutritional declaration to appear on the label. It may be expressed using the symbol "E" (for energy), in kJ and kcal per 100 mL. The full nutritional declaration (fat, saturated fatty acids, carbohydrates, sugars, proteins, salt) may be transmitted digitally. There will be two options for calculating these values: using conversion coefficients (Appendix 14 of Regulation (EU) 1169/2011) based on the alcohol and sugar content of wines, or using average data established and accepted by the sector.

List of the 23 additives (authorised in the EU):

Oenological substances	Function	Oenological substances	Function
L-ascorbic acid	Preservative	Gomme arabic	Stabiliser
Sulphur dioxide	Preservative	Metatartaric acid	Stabiliser
Potassium bisulphite	Preservative	Yeast mannoproteins	Stabiliser
Potassium metabisulphite	Preservative	Carboxymethylcellulose	Stabiliser
Potassium sorbate	Preservative	Potassium polyaspartate	Stabiliser
Lysozyme	Preservative	Fumaric acid	Stabiliser
Dimethyl carbonate (DMDC)	Preservative	Argon	Packaging gas
Citric acid	Acidity regulator	Nitrogen	Packaging gas
Malic acid (D, L-; L-)	Acidity regulator	Carbon dioxide	Packaging gas
Lactic acid	Acidity regulator	Aleppo pine resin (restina wine only)	Other
Tartaric acid (L(+)-)	Acidity regulator	Caramel (special wines only)	Other
Calcium sulphate (liqueur wines only)	Acidity regulator		



WHAT ARE THE ALTERNATIVES TO ADDITIVES?

	Levers of action		
Preservatives	Sacrificial tannins, bio-protection yeasts, inactivated yeasts with guaranteed glutathione content, yeasts that do not produce SO ₂ , selected lactic acid bacteria, chitosan, etc.	Physical treatment methods under development: ultra-high pressure, pulsed electric fields.	
Acidity regulators	Yeasts that produce organic acids (<i>Lachancea Thermotolerans</i> for lactic acid).	Possible physical methods for acidification: cationic resins, electro dialysis, etc.	
Tartaric and calcium stabilisers	Cold stabilisation with the addition of: <ul style="list-style-type: none"> Tartaric salts Calcium salts 	Other possible physical methods for tartaric stabilisation: cationic resins, electro dialysis, etc.	
Yeast mannoproteins	Anticipated stabilisation during the vinification and ageing phases, derived from specific yeasts to stabilise and add fullness and roundness.		
Coating gums	Anticipated work during the fermentation phases, adding tannins, specific yeast derivatives and oak chips to increase roundness and sweetness.		
Stabilising gums	Tannins, yeasts and yeast derivatives for colour stabilisation.		

➔ For further information, please contact your IOC representative.