

What requirements does wine have to comply with to be allowed on the European market?

Buyer requirements for wine can be divided into legal and non-legal requirements, both of which your product must comply with if you want to sell to Europe. Additionally, you can enter niche markets such as organic or fair trade wine by adhering to certain standards.

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1. What requirements must my product comply with?

When exporting to Europe you have to comply with the following legally binding requirements:

Compliance with EU oenological practices

The European Union has a set of allowed and restricted oenological practices. To prove compliance with allowed oenological practices, all wine imported to the European Union needs to be accompanied by a certificate and analysis report for wine. The certificate and analysis report must be presented in a single document (the so-called “V I 1 document”).

Allergen declaration

An important item for wine in the analysis report is the sulphur dioxide content. There are maximum levels set in [legislation](#) for different types of wine, and wines containing sulphite must be labelled with “contains sulphites”.

If egg or dairy products are used in your wine, you have to declare these on your label as determined by [legislation](#).

Tips:

Familiarise yourself with the allowed oenological practices. The European legislation on wine consists of one [framework regulation](#) and several implementing regulations for [oenological practices](#), [labelling](#) and [trade with third countries](#). The European Commission also provides an [overview](#) of the current applicable legislation for wine.

Make sure that the accompanying documents are complete and in order. The European Union also provides an [example](#) of the V I 1 Document.

The certificate and the analysis report are not required for products in labelled containers of less than 5 litres fitted with a non-reusable closure and forming part of a total consignment not exceeding 100 litres.

Labelling and presentation

There are strict rules on which information should be shown on the label and how this information has to be presented. For example, there are requirements set for the size of characters used on the label, and about what information must be visible at the same time from the same point of view.

The information which can be mentioned on labels is divided into compulsory and optional particulars. Compulsory particulars must be shown on the labels, while optional particulars may be shown (under specific conditions). Furthermore, there are rules for the use of certain bottle shapes which may only be used for certain types of wine.

Tips:

Buyers will expect that you are aware of the labelling rules. Make sure you provide labels that comply. To avoid the risks of consignments being refused, you can also outsource the design of your label to a specialised company.

A useful [guide](#) for more information on wine labelling is published by the British Food Standards Agency. It shows exactly which information may be shown and how it should be shown.

Read more about [presentation and labelling of wine](#) on the EU Export Helpdesk.

Some buyers may provide their own label designs. Consult with your buyer on this matter beforehand.

Food safety: Traceability, hygiene and control

Wine marketed in Europe must meet the requirements of the European Union's food law scheme. The starting point is that all food placed on the market must be safe. To guarantee food safety and to allow appropriate action in cases of unsafe food, food products must be traceable 'from-farm-to-fork', risks of contamination must be limited by defining critical control points (HACCP) and food products are subjected to official controls.

Tips:

Read more about [health control](#) on the EU Export Helpdesk.

Search in the [European Rapid Alert System for Food and Feed \(RASFF\) database](#) for wine to see examples of withdrawals. Examples of reasons behind these withdrawals are: too high or undeclared content of sulphite and the addition of prohibited ingredients, such as monoethylene glycol (MEG).

Avoid Ochratoxin A and lead contamination

Contaminants are substances that have not been intentionally added to food, but which may be present as a result of the various stages of its production, packaging, transport or holding. There are threshold limits set for several contaminants, in order to avoid negative impact on the quality of food and risks to human health.

For wine there is risk of contamination of Ochratoxin A (OTA) and lead. OTA is formed when grapes are contaminated by certain mould species. The maximum allowed level for Ochratoxin A is 2.0 µg/kg (a mycotoxin). For lead there is a threshold limit of 0.20 mg/kg.

Tips:

Find out more about prevention and reduction of [Ochratoxin A](#) and [lead contamination](#) in wine in the Codes of Practice published by the Codex Alimentarius.

Check the European Commission's [factsheet](#) on food contaminants for more information.

Full overview of requirements for wine:

For a full list of requirements, please consult the [EU Export Helpdesk](#) where you can select your specific product code under chapter 2204.

2. What additional requirements do buyers often have?

In addition to the legally binding requirements, you also have to comply with the following non-legal requirements in order to be able to find a buyer.

Food Safety Certification as a guarantee

As food safety is a top priority in all food sectors, you can expect many players to request extra guarantees from you through certification. Many wine importers require the implementation of a food safety management system. Examples of internationally acknowledged systems relevant for the supermarket segment are [BRC](#), [IFS](#), [FSSC 22000](#) and [SQF](#). For most on- and off-trade segments, [HACCP](#) is the most relevant certification.

Different buyers may have different preferences for a certain management system, so before considering certification against one of these standards, it is advised to check which one is preferred. All the mentioned management systems are recognised by the [Global Food Safety Initiative \(GFSI\)](#), which means that they should be accepted by several major retailers. However, in practice some buyers still have preferences for one specific management system.

Tips:

European market entry preparation is more likely to include implementing a food safety management system than not (especially when targeting larger buyers). It is therefore important to familiarise yourself with them. Familiarise yourself with HACCP and try to implement this certification.

Depending on the country you plan to export to, there may be preferences for a specific management system. For example, if you only plan to export to the United Kingdom, applying for BRC certification would be the most logical choice. When you plan to target more markets, check which specific food safety management systems are most commonly requested in your target market. In any case, choose a management system that is GFSI approved.

Read more on the different Food Safety Management Systems at ITC's [Standards Map](#).

CSR - Corporate Social Responsibility

European buyers pay more and more attention to their corporate responsibilities regarding the social and environmental impact of their business (especially in Northern and Western Europe). This is not just driven by governmental guidelines but also by the changing market. Millennials (people born between 1982–2000) are more concerned about the origin and the way a wine has been made than ever before. This also affects you as a supplier. Common requirements are the signing of a suppliers' code of conduct in which you declare that you and your suppliers do business in a responsible way.

Several larger retailers participate in initiatives such as the [Ethical Trading Initiative \(ETI\)](#) or the [Business Social Compliance Initiative \(BSCI\)](#). These initiatives focus on improving social conditions in their members' supply chains. This implies that you, as a supplier, are also required to act in compliance with their principles.

Tips:

Be aware that most environmental and social malpractices take place in the vineyards (which may not be a part of your company). Think about a way to assure responsible business at the premises of your suppliers.

Consider defining and implementing your own code of conduct. This is not required by buyers, but may be a good way to show potential buyers your views on corporate responsibility.

Familiarise yourself with the [ETI base code](#) to check what [ETI members](#) require from their suppliers.

Assess your company's current performance by doing a self-assessment, which you can find on the [BSCI website](#).

Implement a quality and resource management system such as the [ISO 14000 environmental management system](#).

3. What are the requirements for niche markets?

In addition to the requirements you have to comply with to be allowed on the European market or to find a buyer, complying with the following additional requirements could offer you a competitive advantage and makes finding a buyer easier.

Fairtrade Certification

Having your wine [Fairtrade](#) or [Fair For Life](#) (FFL) certified is the most far-reaching way to prove your business performance for social conditions in your supply chain. After certification by an independent third party, you may put the logo of the certification on your product.

Note that your Fairtrade-certified products will not be sold at a premium price. Wines still need to be very competitive on price points, but it allows exporters from developing countries to be active in their own niche segment.

Tips:

Fairtrade certification is relatively expensive, but could give you access to supermarkets. Before obtaining certification, make a proper market analysis to see if (potential) buyers would require certification.

Fairtrade provides separate standards for [small wine grape producer organisations](#) and [wine grape plantations](#).

Organic niche market

Organic wine is produced and processed by not making use of pesticides, herbicides and chemical fertilisers. Although it has been growing steadily for years, the market for organic wine remains small.

To market organic wine in Europe, grapes must be grown using organic production methods which are laid down in [legislation](#) from the European Union. Your grapes and the wine production facilities must be audited by an accredited certifier, before you may put the European organic logo on your products, as well as the logo of the


standard holder.

Tip:


Implementing organic production and becoming certified can be expensive. In the current market the return on investment may not be high. Therefore, first check with your buyer if he requires organic certification.

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