



INFORMATION

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1 EU WINE REFORM IMPACT ON LABELLING

From the 1st of August 2009 the EU's new wine regime will come into effect. One of the main objectives of this new regime is to increase the competitiveness of the EU's wine producers. At first glance it seems as if the new regime will not change much on the labelling front for wine imported into the EU, but the full impact thereof will only be clear once implementing regulations have been published.

We have just received draft implementing measures from the EU Commission. Thankfully, a transitional period up to 31 December 2010 is proposed. Thus, if this proposal is accepted, wines placed on the market or labelled before 31 December 2010, that comply with the relevant labelling provisions applicable before 1 August 2009 may be marketed until stocks are exhausted.

However, some questions remain unanswered. For example:

- (a) Will imports also have to show either "protected designation of origin" (PDO) or "protected geographical indication" (PGI) in the case of Wines of Origin, or will "Wine of Origin" or "W.O." still be accepted?
- (b) If provenance is indicated as "Wine of South Africa", must the designation for the category of the grapevine product (wine) still be indicated or will the "wine" in the provenance indication suffice?
- (c) Will a South African PDO/WO wine be allowed not to indicate "wine" as will be the case with EU products?
- (d) We have heard that the implementing measures will differentiate between a "blended rosé" and a "traditional rosé". Will the oenological processes for this differentiation be spelled out? Will it still accommodate our "Blanc de noir wine"? This matter is not dealt with in the draft implementing measures.

As soon as the final implementing measures are available we shall let you have full details on all amendments to the EU's labelling requirements. Hopefully, all our questions will be answered by then.

2 USE OF PIMARICIN

We have had a query on the use of pimaricin (natamycin) in export wine. We can confirm that for most countries we export to, use of this product is not allowed, and can and is analysed for.

As an alternative, South Africa and most of our wine trading partner countries do allow the use of dimethyl dicarbonate (velcorin). The O.I.V.'s prescriptions combine the requirements of these countries for use of dimethyl dicarbonate in wine:

“Objectives:

- a) Obtain microbiological stability of bottled wine containing fermentable sugars;
- b) Prevent the development of unwanted yeast and lactic bacteria.

Prescriptions:

- a) Should only be added shortly before bottling;
- b) The dosage should be no more than 200 mg/l expressed as dimethyl dicarbonate;
- c) The addition of dimethyl dicarbonate must not lead to surpassing the maximum content level for methanol in wine, as recommended by the O.I.V.;
- d) The wine should not be placed on the market as long as dimethyl dicarbonate is detectable.”.

3 UPDATE ON EU ALLERGEN LABELLING

The EU Commission has confirmed that the new deadline of 31 December 2010 for the indication of the “new” allergens (milk and egg products) has now been officially approved.

Interestingly, the draft implementing regulations referred to above provides, as an alternative for “contains sulphites” and as an attempt to avoid the indication of multiple languages, for the use of the pictogram below. Question is, what about the expression “allergy information” in the pictogram – will all EU countries accept this expression in English?



The ultimate objective is to be able to show all the allergens (also the milk and egg products as from 31 December 2010) in a pictogram as per the example below.



We shall keep you informed of any developments in this regard.



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