

## Wine Institute Communication on QR Code Labeling for the EU

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Wine Institute has received numerous questions regarding the status of QR code labeling for exports to Europe. Many members indicated that they will begin printing labels for the 2024 vintage soon. We offer the following as the best guidance at this time.

Once we have greater certainty on how to advise wineries on this issue, we will be communicating it via multiple channels. In the meantime, please reach out to <u>Jamie Ferman</u>.

## Q: Do QR codes need to be identified in a particular manner or with a specific heading on the wine label?

A: Yes. However, each EU Member State you are exporting to may require different text next to the QR code.

Some EU Member States accept the single term "ingredients" while others demand some combination of the two terms "ingredients and nutrition." <u>View this chart</u> for more information on various Member State requirements. At this time, there is no unified approach to the labeling of the QR code for all EU Member States.

Until a unified approach is communicated by the European Commission, we suggest that exporters consult with importers to determine the appropriate labeling of the QR code for the destination market.

Wine Institute continues to work with the U.S. government and EU industry colleagues to secure a harmonized approach to the labeling of the QR code so that a single label can be used for the sale of wine in all EU Member States. However, we do not have a timeline for a final solution.

**NOTE:** Italy and Spain require a QR code for the communication of recycling information (via the ingredients e-label). As of Jan. 1, 2025, Spain will allow for recycling information to be communicated via the QR code. Note: Spain does not require additional labeling.

Italy requires the QR to be labeled with the (i) symbol. The EU guidance does not preclude the inclusion of the (i) symbol but rather says that the symbol by itself is inadequate.

## Q: What should I do if an EU Member State customs authority or importer asks for other terms to be used in addition to "ingredients" and/or for the term to be listed in multiple languages?

A: Please contact Wine Institute staff if an importer or customs authority demands QR code terms to be translated into multiple languages. We are aware that some EU-based retailers are requesting that the terms next to the QR code be translated into numerous EU languages. While this is not required under the current regulations, exporters will need to determine whether or not to meet retailer demands that go beyond the basic requirements.