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1 AMENDMENTS TO REGULATIONS OF THE LIQUOR PRODUCTS ACT

The Minister of Agriculture, Forestry and Fisheries has recently approved and published amendments to the Regulations under the Liquor Products Act, 60 of 1989.

The updated Regulations can be downloaded [here](#).

Noteworthy amendments are:

1.1 Imported must/concentrated must used in wine to be declared on the label

Imported must or concentrated must, used as the primary ingredient of wine produced in South Africa, or is added to must or wine before or during fermentation in South Africa, must now be declared on the label.

1.2 Grape varieties allowed for wine production

"Muscat blanc" added as a synonym for "Muscat de Frontignan". Please note that "Muscat de Frontignan" is not allowed on South African wine within the territory of the EU as it is also a geographical indication, but is allowed within our borders.

"Cinsaut blanc" added to the list.

1.3 Alternative rosé added as a wine class

Table 2 of the Regulations sets out the requirements for the wine classes known as "alternative red" and "alternative white". "Alternative rosé" has now been added with the following requirements:

- The product shall complete malolactic fermentation.
- The residual sugar content of the product shall not exceed 4.0 gram per litre.
- The sulphur dioxide content of the product shall not exceed 40.0 milligram per litre.
- The product shall have the colour that is distinctive of a rosé wine.
- The product may only be sold if it has been certified.

As with alternative red and white, indication of the class designation "alternative rosé" is compulsory.

1.4 Egg added for use in the production of a liqueur

Although the addition of egg to a spirit-based liquor (which includes liqueur) is already authorized in Table 6 of the Regulations, it has now been added in the Table 5 production framework for liqueur to remove any doubt in this regard. This is in line with international standards.

1.5 Addition of tannin and potassium polyaspartate

Addition of tannin now limited to wine, spirits (excluding grape spirit, cane spirit, vodka, unspecified spirit and mixed spirit), alcoholic fruit beverage and grape-based liquor.

Potassium polyaspartate, internationally used as a substantially less expensive treatment to contribute to tartaric stability, has been added to South Africa's list of substances allowed in wine production.

1.6 Definitions for “single malt whisky” and “blended malt whisky”

The following definitions have now been added to the Regulations:

- Single malt whisky – a malt whisky from a single distillery.
- Blended malt whisky – a blend of two or more single malt whiskies from different distilleries.

2 AMENDMENTS TO WINE OF ORIGIN SCHEME

The amendments below were recently approved and published. An updated Scheme can be downloaded [here](#).

2.1 Submission of vineyard status returns compulsory

Information on the status of vineyards in South Africa is of vital importance to all role players for planning purposes and to the board for the certification of wine. For an effective mechanism to make sure vineyard status returns are lodged by producers, it is now compulsory to lodge such return when applying for an authority to press grapes. The board may not issue an authority to press grapes if a vineyard status return was not lodged in respect of such grapes.

2.2 Grape varieties allowed for certified wine production

"Muscat blanc" added as a synonym for "Muscat de Frontignan". Please note that "Muscat de Frontignan" is not allowed on South African wine within the territory of the EU as it is also a geographical indication, but is allowed within our borders.

"Cinsaut blanc" added to the list.

2.3 Indication of multiple varieties on a label

In compliance with a World Wine Trade Group agreement, the scheme now provides that if the volume of two or more varieties in a blend is together 85 percent (previously 80 percent) or more of the total volume of the wine concerned and each of those two or more cultivars constitutes not less than 20 per cent of the total volume of that wine, only those two or more varieties need to be shown on a label. The new requirement will be applied to blends made up from 2020.

3 USE OF IPRIDIONE – EU: CORRECTION

In Wine Law of 31 May 2019, we said that the new MRL for Iprodione will apply from 31 January 2020. This is not correct. In fact, the date is 31 July 2019. Thus, the new default MRL of 0.01 mg/kg will apply to all products produced in the EU or imported into the EU after 31 July 2019.

4 SA LABELLING GUIDE UPDATED

Please see attached hereto. Updates are highlighted in yellow. A clean version can be downloaded [here](#).



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WINE LAW is a publication of:

THE WINE AND SPIRIT BOARD

WINE OF ORIGIN (WO) · INTEGRATED PRODUCTION OF WINE (IPW) · ESTATE BRANDY

LABELLING REQUIREMENTS FOR SOUTH AFRICAN WINE

These requirements apply to SA wine sold locally. Labels of wines exported, must also comply with the requirements of the country to which they are exported.

All labels for certified wine* must, prior to printing, be submitted to the Label Committee of the Wine and Spirit Board for approval. Contact Anneline du Plessis, Tel.: 021 807 5733, Email: anneline@sawis.co.za

See paragraph	Item	Only allowed on certified wine* if marked 'x'
MANDATORY ITEMS - See paragraph 1		
2	The CLASS DESIGNATIONS "sparkling wine", "perlé wine", "sweet natural wine", "skin macerated white", "extended barrel aged red/gris", "natural pale/non-fortified pale", "methode ancestrale", "alternative white/rosé/red" and "sun wine", if applicable	
3	ALCOHOL CONTENT	
4 , 12	NAME AND FULL BUSINESS ADDRESS <u>OR</u> CODE NUMBER OF RESPONSIBLE SELLER	
5	VOLUME DECLARATION, e.g. "750 mL"	
6	The EXPRESSION "Contains sulphites"	
7	ONE of the HEALTH WARNINGS	
8	FILLING DATE on non-glass containers	
9	LOT IDENTIFICATION (Not required for certified wine.)	
CONDITIONAL ITEMS - See paragraph 10		
11	EXPRESSION "Wine of Origin" or "W.O." <u>AND</u> NAME OF ORIGIN AREA (e.g. "Wine of Origin Paarl")	x
12	ESTATE NAME <u>AND</u> EXPRESSION "Estate Wine" (e.g. "Kanonkop Estate wine")	x
13	The EXPRESSION "single vineyard wine"	x
14	Cultivar/variety	x
15	Vintage year	x
16	The CLASS DESIGNATIONS "special late harvest wine", "noble late harvest wine", "blanc de noir-wine", "wine from naturally dried grapes", "Cape white", "Cape ruby", "Cape tawny", "Cape dated tawny", "Cape late bottled vintage", "Cape vintage", "fino", "amontillado", "oloroso", "pale dry", "pale cream", "medium cream" and "full cream", if applicable	x
17	The name of a co-operative	
18	Sweet/dry - descriptions	
19	Indications of origin	x
PROHIBITED ITEMS - See paragraph 20		
	The word "superior" or a translation thereof	
21	The name of a generally known viticulture area	
22	Items that qualify certification	
23	Items that are derogatory, inaccurate, untrue, vague or could create a misleading impression	

* "Certified wine" means wine produced in terms of the provisions of the Wine of Origin Scheme.

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Except for the volume declaration, the expression "contains sulphites", the lot identification and the health warning, all mandatory items must be within the same field of vision on one or more labels of a container - obviously not on the base of a container. In practice all mandatory particulars usually appear on back labels (side panels in the case of bag-in-a-box) - thus, all in the same field of vision. Mandatory items must be clearly distinguishable from each other and from any other particulars on a label. Each separate mandatory item, except the lot indication, must be in characters of the same colour, type and size. All characters must be clearly legible, indelible and, except for the lot indication, must be printed on a uniform and clearly contrasting background. Minimum character heights for all the mandatory items except the volume declaration, lot identification and health warning are as follows - 1 mm on containers smaller than 250 ml, 1,5 mm on containers from 250 ml to 375 ml and 2 mm on containers larger than 375 ml. Character height for the volume declaration - see [table](#) at paragraph 5. For the health warning minimum character height is not prescribed, but a white background of a specified area is required - see [paragraph 7](#). Character height is not prescribed for the lot identification.

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The class designation "perlé wine" may be substituted by the designation "petillant" and "sweet natural wine" may be substituted by "natural sweet wine", "natural sweet" or "sweet" or a similar expression. The class designation "sweet natural wine" is only mandatory if the residual sugar content of the wine is more than 30 g/l. A natural wine with a residual sugar content of more than 30 g/l and not indicated as a late harvest, special late harvest, noble late harvest or wine from naturally dried grapes, must be identified as a sweet natural wine.

If the pressure of a methode ancestrale is more than 300 kPa, both "methode ancestrale" and "sparkling wine" must be indicated in conjunction with each other, wherever it appears on a label. If the pressure is equal to or less than 300 kPa, both "methode ancestrale" and "perlé wine" must be indicated in conjunction with each other, wherever it appears on a label.

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Alcohol content is defined as "a percentage ethyl alcohol per volume of the product" and must consist of a figure together with a percentage symbol and the expression "alcohol" or "volume" or abbreviations thereof. For example: "15 % alc" or "12,5 % vol" or "Alc 12,2 %" or "10,9 % alc per vol" etc.

A tolerance of 1 is permitted between the strength labelled and the alcohol strength determined upon analysis of the wine. A wine of 11,5 % vol may thus be indicated as 10,5 % vol up to 12,5 % vol.

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A responsible seller is defined as someone by or for whom wine is bottled with a view to the sale thereof. The name of a judicial person must be indicated in full (XYZ Pty. Ltd.) - however, see [paragraph 17](#) hereunder for the names of co-operatives. Where the address includes the name of an area of origin or generally known viticultural area, that name may not be accentuated or leave any doubt as to the origin of the wine concerned.

A code number may be used in place of above-mentioned name and address. Code numbers are issued by the administering officer, Department of Agriculture, Directorate Plant Health and Quality, Private Bag X5015, Stellenbosch, 7599, (Rhonél Basson 021- 809 1688).

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The volume declaration must be in **boldface**, unless blown, embossed or moulded on the surface concerned. If the net quantity is less than 1 000 ml, use the unit **millilitre(s)** (or **mL** or **ml**) or **centilitre(s)**

(or **cL** or **cl**). If equal to or more than 1 000 ml use **litre(s)** (or **L** or **l**). The decimal indicator must be a comma or a period (full stop), e.g. "**1,5 L**" or "**1.5 L**". Do not use a full stop or the letter "s" after any of the abbreviations. Use a single space between the number and the unit, e.g. "**750**" followed by a single space and then "**mL**". Minimum character heights are:

Net contents	Minimum height of numbers and letters in mm
50 mL or less	2
More than 50 mL, but not more than 200 mL	3
More than 200 mL, but not more than 1 L	4
More than 1 L	6

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The "contains sulphites" must be indicated if sulphur dioxide is present in a concentration of more than 10 milligrams per liter, measured as total sulphur dioxide.

Claims that a wine is free of sulphites may only be made if such wine contains no discernible sulphites. Claiming that no sulphites were added or that the product is low or lower in sulphites, may only be made if the wine contains no more than 10 milligrams per liter, measured as total sulphur dioxide.

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Use any **one** of the messages below.

- Alcohol reduces driving ability, don't drink and drive.
- Drinking during pregnancy can be harmful to your unborn baby.
- Alcohol abuse is dangerous to your health.
- Alcohol increases your risk to personal injuries.
- Alcohol is a major cause of violence and crime.
- Alcohol is addictive.
- Don't drink and walk on the road, you may be killed.

The message must be in black on a white background. The white background must be at least one eighth of the total area of the selected label - usually the back label. No minimum letter height is prescribed for the message, but it must be legible - do not use cursive type fonts.

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The filling particulars must consist of the expression "Filled on" followed by the date of filling, in the format dd/mm/yyyy.

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The indication of the lot identification is required for liquor products filled after 30 June 2012, but is not required for certified wine as the number on a certification seal is regarded as a lot identification. "Lot" means a batch of sales units of a liquor product produced, manufactured or packaged under practically the same conditions - a homogeneous group. The lot identification must consist of any indication or mark identifying the lot to which a liquor product belongs, preceded by the letter "L".

The lot mark should be readily intelligible by anyone and should not require a decoder or other aid. Most operators use some form of the Julian calendar format where the "L" is followed by at least the filling date. For example, L12206, where 12 is the year (2012) and 206 denotes the day (206th day of the year). This can be supplemented by any additional detail, such as time, a bottling batch number or letter,

etcetera. Any format is allowed, as long as it can be used to trace that homogenous group. It is advisable to include lot identifications on outer cases and applicable delivery documents to facilitate traceability.

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With "conditional items" is meant that certain conditions must be complied with before these items may be used. These conditions are set out below. The items marked with a "x" in the third column is also subject to the condition that it may only be used on certified wine - this wine must be produced in terms of the provisions of the Wine of Origin Scheme.

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A wine of origin of a particular area of origin (e.g. geographical unit such as "Western Cape", region such as "Coastal Region", district such as "Paarl" or ward such as "Durbanville") must be produced solely from grapes harvested in the area of origin concerned.

Only the names of officially-demarcated origin areas may be used. The expression "Wine of Origin" or "W.O." must appear immediately above or below or next to the name of the origin area. It must be shown within the same field of vision as the mandatory items mentioned in paragraphs 2 to 8 above, and in the same way as these mandatory items - see [paragraph 1](#). The name of an origin area other than the applicable origin area may also be indicated, but only in such a way that there can be no doubt that the name of the other origin area has no connection with the origin of the wine concerned, e.g. to indicate the location of the applicable origin area.

Production/origin areas may be indicated as blends provided that each production area in the blend is produced on a separate production sheet (W.O. Scheme) and an official blend was made. Where each production area consists of 30 % or more of the blend, percentages need not be indicated, but the production areas must appear in descending order. If any one production area consists of less than 30 % of the blend, the percentage of each production area must also be indicated.

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An estate wine of a particular estate must be produced solely from grapes harvested on the estate concerned. The wine must be grown, made and bottled on such estate.

Only officially-registered names of units for the production of estate wine (estate names) may be used. Where another trade name is used on such an estate wine it must be ensured that there can be no doubt as to which name applies to the expression "Estate Wine". The name of an applicable origin area must also be used on an estate wine, e.g. "Wine of Origin Stellenbosch" with "Kanonkop Estate Wine".

The name of an officially registered unit for the production of estate wine (estate name) may also be used on certified wine other than estate wine as well as non-certified wine. The expressions "estate wine" and "estate" may not be used on such a wine or the impression created that the wine was made from grapes harvested on the estate. The estate name must thus figure solely as a trade name or be indicated in the name and address of the responsible seller.

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The term "single vineyard wine" may only be used for wine produced from grapes derived from a unit officially registered for the production of single vineyard wine. Such a unit must consist of a single variety and the area may not exceed 6 hectares.

Reference may be made on a label to the fact that a wine is produced from grapes derived from individual blocks or sites, provided that each block or site referred to is registered as a unit for single vineyard wine and verified as such by the Wine and Spirit Board. However, no reference may be made to "vineyard

wine".

The word "vineyard" may also be used in general descriptive terms, but may not create the impression that the wine concerned comes from a specific vineyard or vineyards. Where the word "vineyard" forms part of a trade name or the name of an organisation such name may be used as long as it does not create a misleading impression.

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Where a wine is certified as originating from one cultivar (that means that at least 85 % of that wine was made from that cultivar), the other cultivars, if any, in that wine may not be indicated. If a wine was produced solely from one cultivar this fact may be indicated.

Where the cultivars in a blended wine is indicated each cultivar in the blend must have been made on a separate production sheet (W.O. Scheme) and an official blending must have taken place. Percentages need not be indicated, but the cultivars must appear in descending order according to volume. All cultivars must be indicated except where two or more cultivars constitute 85 % or more of the blend and each of those two or more cultivars consists of 20 % or more of the blend - then only those two or more cultivars may be indicated in descending order.

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Vintage year can be indicated if at least 85 % of the wine consist of wine produced from grapes harvested during the year indicated. The vintage year (e.g. "2006") must be so indicated that it is clear that it relates to the vintage year of the wine. If not (e.g. other dates also appear on the label), the word "vintage" must be indicated together with the vintage year.

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The "wine" in "special late harvest wine", "noble late harvest wine" and "blanc de noir wine" may be omitted. "Vin gris" may be used in the place of "blanc de noir wine". The class designation "wine from naturally dried grapes" may be substituted by the designation "straw wine" - the "straw" refers to the colour of such a wine. If the residual sugar content of a special late harvest wine or a wine from naturally dried grapes is less than 20 grams per litre it must also be indicated whether that wine is "extra dry", "dry" "semi-dry" or "semi-sweet" (see [paragraph 18](#)). The class designation "Cape vintage" may be substituted by the designation "Cape vintage reserve".

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The name of a co-operative must always be indicated in characters of the same colour, type and size and must be indicated in full except that words such as "co-operative", "company", "wine farmers", "limited", etcetera, may be substituted by "co-op" "wine cellar" or "cellar".

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If the under-mentioned or similar expressions are used on wine (excluding fortified wine and sparkling wine), the following requirements apply:

extra dry - a maximum residual sugar content of 2,5 g/l

dry - a maximum residual sugar content of 5 g/l, or not exceed 9,0 g/l if the total acidity expressed as gram of tartaric acid per litre is not more than 2 gram below the residual sugar content.

semi-dry/medium dry - a residual sugar content between 5 and 12 g/l, or not exceed 18,0 g/l if the total acidity expressed as gram of tartaric acid per litre is not more than 10 gram below the residual sugar content.

semi-sweet/medium sweet - a residual sugar content between 5 and 30 g/l

sweet - a residual sugar content of more than 20 g/l

For sparkling wine the following requirements apply (where the residual sugar content justifies the use of more than one designation, only one may be used):

- brut nature (or Naturherb, Bruto natural, Pas dose, Dosage zero, Natūralusis briutas, Īsts bruts, Přírodně tvrde, Popolnoma suho, Dosaggio zero) : a residual sugar content of less than 3 g/l.
- extra brut (or Extra herb, Ekstra briutas, Ekstra brut, Ekstra bruts, Zvláště tvrde, Extra bruto, Izredno suho, Ekstra wytrawne) : a residual sugar content of less than 6 g/l.
- brut (or Herb, Briutas, Bruts, Tvrde, Bruto, Zelo suho, Bardzo wytrawne) : a residual sugar content of less than 12 g/l.
- extra dry (or Extra trocken, Extra seco, Labai sausas, Ekstra kuiv, Ekstra sausais, Kulonlegesen szaraz, Wytrawne, Suho, Zvláště suche, Extra suche) : a residual sugar content of more than 12 g/l, but less than 17 g/l.
- dry (or Sec, Trocken, Secco, Asciutto, Ξηρός, Tor, Seco, Torr, Kuiva, Sausas, Kuiv, Sausais, Szaraz, Połwytrawne, Polsuho, Suche,) : a residual sugar content of more than 17 g/l, but less than 32 g/l.
- semi-sweet (or Demi-sec, Halbtrocken, Abboccato, Halvtor, Medium dry, Ημίξηρος, Semi seco, Meio seco, Halvtorr, Puolikuiva, Pusiau sausas, Poolkuiv, Pussausais, Felszaraz, Połsłodkie, Polsladko, Polosuche, Polosladke) : a residual sugar content of more than 32 g/l, but less than 50 g/l.
- sweet (or Doux, Mild, Dulce, Sod, Dolce, Γλυκός, Doce, Sot, Makea, Saldus, Magus, Pussaldais, Edes, Helu, Słodkie, Sladko, Sladke) : a residual sugar content of more than 50 g/l.

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An indication of origin comprises any indication which, directly or indirectly, says that the wine concerned was made from grapes originating from an identifiable piece of ground or area within South Africa. Only wine produced in terms of the Wine of Origin Scheme (certified wine), may contain indications of origin - and then only authorised indications of origin.

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The items mentioned under this subheading ("PROHIBITED ITEMS") are prohibited on all wine.

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These are names of areas not officially demarcated as origin areas, for example "Boland", "Klawer", "Firgrove", etcetera.

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Particulars that are certified by the Wine and Spirit Board are origin, cultivar and vintage year. This prohibition thus only applies to certified wine since the particulars concerned may in any case not be used on uncertified wine.

With "qualify" is meant "further defined", in other words the origin for which a wine is certified may not be drawn smaller. If, for example, a wine is certified as originating from the origin area Paarl and the label indicates that the wine was made from grapes originating from vineyards in the vicinity of the Berg River or that it comes from a specific farm or piece of ground, such indications qualify the origin certification. The same applies if it is stated that a wine was made from a specified clone of a cultivar.

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Prohibited hereunder are expressions like "gluten free", "natural wine", "natural grapes" and the like.

Claims of farming sustainably or environmentally friendly may only be made on wine certified under the

Integrated Production of Wine scheme.

Lower in alcohol claims are only allowed if the wine's actual alcohol content is not more than 10 % alcohol per volume.

Claims of low or lower in kilojoules or the like can only be used if the total alcohol (potential plus actual alcohol) is not more than 10 % alcohol per volume.

June 2019