



COMMISSION NOTICE

Questions and answers on the implementation of EU rules on the de-alcoholisation of wines

(C/2024/694)

This document provides technical replies to questions that the Commission services have received, and have been discussed with experts from Member States, in relation to the application of the rules on the de-alcoholisation of wines.

This document is intended to assist national authorities and businesses in the application of this EU legislation. Only the Court of Justice of the European Union is competent to authoritatively interpret Union law.

- 1) ***We are reading the second sentence of the following provision as a restriction: ‘The de-alcoholisation processes used shall not result in organoleptic defects of the grapevine product. The elimination of ethanol in grapevine products shall not be done in conjunction with an increase of the sugar content in the grape must.’ (Regulation (EU) No 1308/2013 ⁽¹⁾, Annex VIII, Part I, Section E).***

We agree. The co-legislators introduced this provision because it seemed incoherent to start increasing the alcohol content of wine through enrichment of musts and later remove alcohol through de-alcoholisation. This is also in line with file 3.5.16 of the OIV code of oenological practices.

- 2) ***At first glance, it seems to be logical that the elimination of ethanol in grapevine products shall not be done in conjunction with an increase of the sugar content in the grape must. However, no market for these wines exists yet (early 2022). Consequently, the producers would have to wait for the next harvest, because most of the basic wine made in Germany is made with enrichment.***

We agree with this analysis, for the specific case presented in the question. If there is no basic wine from the harvest 2021 made without enrichment, it would not be possible to produce de-alcoholised wines in 2021-2022. That possibility would only materialise from harvest 2022 onwards. It is the responsibility of wine producers to programme their production each year in response to the market demand.

- 3) ***However, we might have to read the provision as follows: ‘The elimination of ethanol in grapevine products shall not be done in conjunction with an increase of the sugar content in the grape must’, but it might be done in conjunction with an increase of the sugar content in the grapes or new wine still in fermentation. (Reasons: (a) grape must and new wine still in fermentation are different categories of grapevine products due to CMO, annex VII part II and (b) grape must and grapes are different categories of wine products due to Annex I to Delegated Regulation (EU) 2019/934 ⁽²⁾).***

The second sub-paragraph of Section E, Part I, of Annex VIII to Regulation (EU) No 1308/2013 prohibits de-alcoholisation if the grape must has been enriched. It indeed does not refer to the addition of sugar (or musts) to grapes or new wine still in fermentation for the purpose of enrichment.

However, in this respect, the question arises whether the enrichment of grapes or new wines still in fermentation would be in line with the spirit of the above legislation.

⁽¹⁾ Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 (OJ L 347, 20.12.2013, p. 671, ELI: <http://data.europa.eu/eli/reg/2013/1308/oj>).

⁽²⁾ Commission Delegated Regulation (EU) 2019/934 of 12 March 2019 supplementing Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards wine-growing areas where the alcoholic strength may be increased, authorised oenological practices and restrictions applicable to the production and conservation of grapevine products, the minimum percentage of alcohol for by-products and their disposal, and publication of OIV files (OJ L 149, 7.6.2019, p. 1, ELI: http://data.europa.eu/eli/reg_del/2019/934/oj).

In the view of the Commission services, this does not seem to be the case since the rationale of the above provision, i.e. that oenological practices having opposed objectives should be excluded, does not support this interpretation.

- 4) ***The Commission indicated that blending wine with de-alcoholised wine to produce partially de-alcoholised is not authorised since it is not listed in Annex VIII, Section E of the CMO. However, could this process be considered as a coupage? Indeed, Article 7(1) of Regulation (EU) 2019/934 states that ‘coupage’ is a mixture of wines or musts of different origins, different vine varieties, different harvest years or different categories of wine or must. The provisions of the CMO classify de-alcoholised and partially de-alcoholised wines in the general category of wines. It seems therefore possible to consider that mixing a wine with a de-alcoholised wine (from another harvest year, for example) could be equated to coupage. Could the Commission confirm or refute this interpretation?***

In accordance with Regulation (EU) No 1308/2013, the following conditions must be fulfilled in order to be able to place on the market a wine as ‘partially de-alcoholised’:

1. The base wine (before de-alcoholisation) must fulfil all the characteristics of one of the categories of grapevine products set out in points (1) and (4) to (9) of Part II of Annex VII to the same Regulation.
2. The alcohol content of the final product must be more than 0,5 % and less than 8,5 % or 9 % for wines referred to in point (1) of Part II of Annex VII to the same Regulation.
3. In order to reduce the alcohol content of the base wine, a de-alcoholisation process must take place.
4. The term ‘partially de-alcoholised’ must accompany the designation of the product on the label.

When a batch of fully de-alcoholised wine is mixed with a batch of non de-alcoholised wine, the resulting alcoholic beverage could be called ‘wine’ if its alcohol content is equal to or greater than 8,5-9 %, because this could be regarded as blending or coupage.

If, on the other hand, the alcohol content of the beverage obtained is less than 8,5-9 %, the beverage cannot be called ‘wine’ because the minimum alcohol content for wine is not reached. Nor can it be called ‘partially de-alcoholised wine’ because the reduction of alcohol content is due to the blending and not to a partial de-alcoholisation process (see condition 3 above).

Blending and coupage should not be used to circumvent the rules on de-alcoholisation and to place on the market as ‘partially de-alcoholised wine’ a blend of wine and de-alcoholised wine, which is done with the purpose to produce a partially de-alcoholised wine without having recourse to a de-alcoholisation process. As mentioned above, the applicable EU legislation does not allow for carrying out such an operation. The product resulting from such blend could be possibly marketed only as long as it is not designated as ‘partially de-alcoholised wine’ and the consumer is properly informed about the characteristics of this product in accordance with Regulation (EU) No 1169/2011 on the provision of food information to consumers ⁽³⁾ (FIC Regulation) and in particular, Article 7 thereof.

On the other hand, the product obtained from the mixing of a batch of partially de-alcoholised wine with another batch of partially de-alcoholised wine could be called ‘partially de-alcoholised wine’ because it corresponds to a blend between wines which have both been partially de-alcoholised.

⁽³⁾ Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004 Text with EEA relevance (OJ L 304, 22.11.2011, p. 18, ELI: <http://data.europa.eu/eli/reg/2011/1169/oj>).

5) ***In relation to sparkling wines:***a. ***Why is it not possible to produce low alcohol sparkling wine with a second alcoholic fermentation of de-alcoholised wine?***

A second alcoholic fermentation leads to the production of not only carbon dioxide but also ethanol. With current types of fermenting yeasts, adding a tirage liqueur to a totally de-alcoholised sparkling wine would therefore likely create a sparkling wine which would have an actual alcoholic strength above 0,5 %, therefore not complying with the definition of 'de-alcoholised wine'. The final product could thus not be labelled as 'de-alcoholised wine' but would very likely fall under the definition of 'partially de-alcoholised wine' and should be labelled as such.

b. ***Why is it legal to call a product 'de-alcoholised sparkling wine', even if it not possible to de-alcoholise a sparkling wine?***

Under the existing legal framework, it is possible to produce de-alcoholised aerated sparkling wines, using a de-alcoholised base wine to which external carbon dioxide has been added.

However, the available de-alcoholisation techniques do not currently ensure the removal of ethanol from sparkling wines while maintaining their content in carbon dioxide. Also, current fermentation techniques do not allow to have a second fermentation without alcohol production. Nevertheless, innovation may change this situation in the future. The legal framework is already in place to encourage the wine sector to develop the necessary innovations for de-alcoholisation techniques. See also reply to Question 5a.

6) ***We have not understood whether the legal framework established by Regulation (EU) 2021/2117 ⁽⁴⁾ is sufficient, or whether the Commission will work in the coming months to amend secondary legislation (Delegated Regulation (EU) 2019/33 ⁽⁵⁾).***

In particular, a recurring question from the undertakings is whether a de-alcoholised wine may include on the label the optional indication of the vintage and/or variety.

In other words, from the point of view of the labelling rule, would the principle be that the product obtained (de-alcoholised or partially de-alcoholised) 'bears with it' all the characteristics/terms which the base wine had (e.g. vintage year '2020', 'Pinot Grigio' variety?), applying the provisions of the current Delegated Regulation (EU) 2019/33, or the way in which these elements are presented on de-alcoholised products, will be specifically detailed in the secondary legislation?

The Commission is not preparing secondary legislation on de-alcoholised wines, including in relation to labelling. In line with Regulation (EU) No 1308/2013, as amended by Regulation (EU) 2021/2117, the label of partially de-alcoholised and totally de-alcoholised wines will have to specify the category of wine accompanied by the terms 'partially de-alcoholised' and 'de-alcoholised' respectively. The other labelling rules under Regulation (EU) No 1308/2013 and Delegated Regulation (EU) 2019/33 remain valid and apply to de-alcoholised wine products. It will therefore be possible to place particulars such as the vintage year or the variety name on the label, if the applicable conditions for these particulars are met. It is to be noted that in absence of specific rules laid down in the sectoral wine legislation, the general labelling and presentation rules, as set out in Regulation (EU) No 1169/2011, apply.

⁽⁴⁾ Regulation (EU) 2021/2117 of the European Parliament and of the Council of 2 December 2021 amending Regulations (EU) No 1308/2013 establishing a common organisation of the markets in agricultural products, (EU) No 1151/2012 on quality schemes for agricultural products and foodstuffs, (EU) No 251/2014 on the definition, description, presentation, labelling and the protection of geographical indications of aromatised wine products and (EU) No 228/2013 laying down specific measures for agriculture in the outermost regions of the Union (OJ L 435, 6.12.2021, p. 262, ELI: <http://data.europa.eu/eli/reg/2021/2117/oj>).

⁽⁵⁾ Commission Delegated Regulation (EU) 2019/33 of 17 October 2018 supplementing Regulation (EU) No 1308/2013 of the European Parliament and of the Council as regards applications for protection of designations of origin, geographical indications and traditional terms in the wine sector, the objection procedure, restrictions of use, amendments to product specifications, cancellation of protection, and labelling and presentation (OJ L 9, 11.1.2019, p. 2, ELI: http://data.europa.eu/eli/reg_del/2019/33/oj).

- 7) *The Regulation provides that the terms ‘de-alcoholised’ and ‘partially de-alcoholised’ are to accompany the names of certain categories of grapevine products (e.g. wine, sparkling wine, semi-sparkling wine, etc.), if they meet certain characteristics.*

Wine operators ask if other sales denominations are needed (e.g. wine without alcohol, alcohol free wine in English, alkoholfreier Wein in German), can be used in addition to (or instead of) the terms laid down in the Regulation, or will they still have to be regulated in secondary legislation?

In accordance with the second sub-paragraph of Article 118 of Regulation (EU) No 1308/2013, the labelling of the products referred to in points 1 to 11, 13, 15 and 16 of Part II of Annex VII of the same Regulation may not be supplemented by any particulars other than those provided for in this Regulation unless those particulars satisfy the requirements of Regulation (EU) No 1169/2011. The use of terms such as ‘without alcohol’, ‘alcohol free’ or ‘alkoholfrei’, as supplementary particulars, in a totally de-alcoholised wine containing 0 % alcohol could in principle be considered in line with Article 7 of Regulation (EU) No 1169/2011 and possible relevant national rules applied in accordance with Article 4(4) ⁽⁶⁾ of Regulation (EC) No 1924/2006 on nutrition and health claims made on foods ⁽⁷⁾. It should be emphasized that any supplementary labelling particular provided by operators on a voluntary basis should always be compliant with the requirements of Regulation (EU) No 1169/2011, in particular the requirements laid down in Articles 36 and 37 thereof. Among others, additional labelling particulars provided on a voluntary basis must not mislead the consumer, must not be ambiguous or confusing; and must be based on the relevant scientific data where appropriate. Moreover, they cannot be displayed to the detriment of the space available for mandatory food information. Under these conditions, it would therefore be considered possible to add such terms on the label of totally de-alcoholised wines (0 % alcohol), but not replace the term ‘de-alcoholised’ therewith which is a compulsory particular for such wines.

- 8) *On oenological practices, the Commission clarified that, at present, the oenological practices permitted are only those currently provided for in current EU legislation (Regulation (EU) No 1308/2013 and Delegated Regulation (EU) 2019/934).*

Does this mean that these practices can be carried out not only on the ‘base wine’ used for de-alcoholisation, but also once the de-alcoholised or partially de-alcoholised product has been obtained?

To name an example: part D of Appendix 10 to Delegated Regulation (EU) 2019/934 regulates the limits and conditions for sweetening wines. If the Regulation provides that sweetening of wines is authorised in certain ways, can we conclude that this practice can also be carried out — under the same conditions as those laid down in Part D of Appendix 10 — on a de-alcoholised or partially de-alcoholised product?

The new rules on de-alcoholisation do not prohibit the use of existing authorised oenological practices after de-alcoholisation has taken place. Some of those (e.g. sweetening, addition of CO₂) might be useful to improve the quality of the partially or totally de-alcoholised wines.

In addition, nothing in the new rules precludes the possibility to de-alcoholise wine products that still contain, before de-alcoholisation, a certain amount of unfermented sugars, as far as such base wine products comply with the requirements applicable to their category. In other words, it is possible to produce a sweet or semi-sweet wine (without enrichment) by stopping fermentation. If that wine is subsequently de-alcoholised, the natural sugars remaining therein can then counterbalance the increased acidity resulting from de-alcoholisation.

⁽⁶⁾ ‘In the absence of specific Community rules regarding nutrition claims referring to low alcohol levels, or the reduction or absence of alcohol or energy in beverages which normally contain alcohol, relevant national rules may apply in compliance with the provisions of the Treaty.’

⁽⁷⁾ Regulation (EC) No 1924/2006 of the European Parliament and of the Council of 20 December 2006 on nutrition and health claims made on foods (OJ L 404, 30.12.2006, p. 9, ELI: <http://data.europa.eu/eli/reg/2006/1924/oj>).

- 9) **What is the relationship between the tolerance allowed for indicating the actual alcoholic strength, i.e. 0,5 % vol. (and 0,8 % for grapevine products with protected designations of origin or geographical indications stored in bottles for more than three years, sparkling wines, quality sparkling wines, aerated sparkling wines, semi-sparkling wines, aerated semi-sparkling wines, liqueur wines and wines of overripe grapes), and the limits in alcoholic strength laid down for de-alcoholised and partially de-alcoholised wines?**

The third subparagraph of Article 44 of Delegated Regulation (EU) 2019/33 provides that the actual alcoholic strength shown on the label may not differ by more than 0,5 % (or 0,8 %) vol. from that given by analysis. This tolerance refers only to the difference between the alcoholic strength indicated on the label and the actual alcoholic strength determined by analysis. This provision, on the tolerance of the values indicated on the label, is applicable to the labelling of all types of wines, including de-alcoholised and partially de-alcoholised wines, within the limits defined for each category or type of wine product. Consequently, the tolerance should not be used to circumvent the limits in alcoholic strength applicable to each category or type of wine product as laid down in Regulation (EU) No 1308/2013, Annex VII, Part II, points (1) and (4) to (9), and Article 119(1)(a)(i) and (ii).

By way of example, a de-alcoholised wine containing 0,2 % alcohol determined by analysis but labelled as '0 %', if the figure is rounded down, or '0,5 %', if the figure is rounded up, would fall under the above labelling tolerance rule and does not need to be relabelled. However, if the analysis shows that it contains 0,6 % alc. or more, it must be relabelled as 'partially de-alcoholised wine' because the measured actual alcoholic strength exceeds the maximum permitted for de-alcoholised wines, and the labelled alcohol content should be also above 0,5 %.

In fact, given the interplay between the labelling requirement (percentage unit or half unit), labelling tolerance (plus or minus 0,5 %) and the required minimum actual alcoholic strength for partially de-alcoholised wines, the label of a partially de-alcoholised wine containing more than 0,5 % and less than 1 % alc. should always display 1 % alc., whereas 0,5 % alc. would always correspond to a de-alcoholised wine.

To be noted that this labelling tolerance applies without prejudice to Regulation (EU) No 1169/2011, and in particular Article 7 thereof which provides that food information must not be misleading.

- 10) **What is the correct reading of Article 119(1)(a)(ii) of Regulation (EU) No 1308/2013 for partially de-alcoholised wines with a designation of origin or a geographical indication?**

In this Article, it is stated that the name of the category is accompanied by 'the term "partially de-alcoholised" if the actual alcoholic strength of the product exceeds 0,5 % by volume and is lower than the minimum actual alcoholic strength laid down for the category before de-alcoholisation'.

For wines without a designation of origin or geographical indication, it seems clear: partially de-alcoholised wines have an alcohol content of between 0,5 % and 8,5 % (or 9 % depending on the wine-growing area).

But what about wines with a designation of origin or geographical indication, for which minimum natural alcoholic strengths are sometimes indicated in their specifications? For example, the French designation of origin Bourgueil provides that the natural alcoholic strength by volume shall not be less than 10,5 %. In that case, our reading of the rules is that a partially de-alcoholised Bourgueil wine has an actual alcoholic strength of between 0,5 % and 10,5 % (and not 8,5 % or 9 %). Do you confirm this?

The word 'category' in point (ii) of Article 119(1)(a) refers to the categories of grapevine products set out in point (1) and points (4) to (9) as mentioned in the second introductory sentence of Article 119(1)(a).

Part II of Annex VII to Regulation (EU) No 1308/2013 specifies different minimum levels of actual alcoholic strength per category of wine product as follows:

- category (1): 8,5 % (wine-growing zones A and B), 9 % (other areas);
- categories (4) and (5): alcoholic strength not specified, thus implicitly identical to (1);

- category (6): 6 %;
- category (7): alcoholic strength not specified, thus implicitly identical to (1);
- categories (8) and (9): 7 %.

These minimum levels of actual alcoholic strengths per category represent the upper limit of actual alcoholic strength for partially de-alcoholised wines, whether or not they are covered by a PDO or a PGI.

Conversely, Article 119(1)(a) of Regulation (EU) No 1308/2013 does not refer to the minimum alcoholic strengths defined in the specifications of PDO or PGI wines. These cannot therefore represent the upper limit of the actual alcoholic strength range for partially de-alcoholised wines.

11) ***Could de-alcoholised and partially de-alcoholised wines be called wines although they do not comply with the minimum actual alcoholic strengths referred to in Regulation (EU) No 1308/2013, Annex VII, Part II, categories (1) and (4) to (9)?***

Wines, partially de-alcoholised wines and de-alcoholised wines are all covered by Common Nomenclature codes which correspond to wines, i.e. CN code 'ex 2204' for wines and partially de-alcoholised wines, and CN code 'ex 2202 99 19' for de-alcoholised wines with an alcoholic strength by volume not exceeding 0,5 % vol.

In addition, the amendment introduced by Regulation (EU) 2021/2117, in Article 119(1)(a)(i) and (ii) of Regulation (EU) No 1308/2013, clarifies that the designation to be used for the different categories of grapevine products when they have undergone a de-alcoholisation treatment, is the name of the category supplemented by:

- '(i) the term "de-alcoholised" if the actual alcoholic strength of the product is no more than 0,5 % by volume; or
- (ii) the term "partially de-alcoholised" if the actual alcoholic strength of the product is above 0,5 % by volume and is below the minimum actual alcoholic strength of the category before de-alcoholisation'.

Furthermore, this provision should be read together with the introductory paragraph added by Regulation (EU) 2021/2117 to Annex VII, Part II to Regulation (EU) No 1308/2013 which indicates that 'the categories of grapevine products set out in point (1) and points (4) to (9) may undergo a total or partial de-alcoholisation treatment in accordance with Annex VIII, Part I, Section E, after having fully attained their respective characteristics as described in those points'.

According to these provisions different ranges of alcoholic strength are possible within a certain category of wine: e.g. for category (1), more than 8,5/9 % alcohol for wines containing alcohol, up to 0,5 % for de-alcoholised wines, and above 0,5 % and below 8,5/9 % for partially de-alcoholised wines.

Given these provisions, partially de-alcoholised and de-alcoholised wines can only be considered as wines, provided that their conditions of production are respected, among others that the de-alcoholisation takes place after the wine has fully attained its characteristics as wine and the permitted de-alcoholisation processes are used.

12) ***Is not de-alcoholisation of sparkling wines uneconomical and would it not require specific control procedures to be put in place?***

In terms of production, it is clear that the available de-alcoholisation processes do not currently ensure the removal of ethanol from sparkling wines while maintaining their content in carbon dioxide. Also, current fermentation techniques do not allow for a second fermentation to take place without alcohol production (unlike for beer). Adding a tirage liqueur to a totally de-alcoholised sparkling wine would likely create a sparkling wine which would have an actual alcoholic strength above 0,5 %, therefore not complying with the definition of 'de-alcoholised wine'. The final product could thus not be labelled as 'de-alcoholised wine' but would very likely fall under the definition of 'partially de-alcoholised wine' and should be labelled as such.

Nevertheless, innovation may change this situation in the future. The legal framework is already in place to encourage the wine sector to develop the necessary innovations for de-alcoholisation processes.

Controls would most certainly have to be adapted to such products.

- 13) ***Is not there a contradiction between Article 9(1)(k) of Regulation (EU) No 1169/2011 and Regulation (EU) No 1308/2013 in relation to the indication of the actual alcoholic strength?***

Article 9(1)(k) of Regulation (EU) No 1169/2011 provides that the actual alcoholic strength must be indicated on the labels of beverages with an alcoholic strength above 1,2 %. On the other hand, Article 119(1)(c) of Regulation (EU) No 1308/2013 provides that the label of wines must display the actual alcoholic strength, regardless of their alcohol content. According to Article 1(4) of Regulation (EU) No 1169/2011, that Regulation shall apply without prejudice to labelling requirements provided for in specific Union provisions. It is therefore Article 119(1)(c) of Regulation (EU) No 1308/2013 that applies to wines as *lex specialis* and not the general rule in Article 9(1)(k) of Regulation (EU) No 1169/2011. Consequently, the actual alcoholic strength of partially or totally de-alcoholised wines must be always indicated on the label, even for beverages with an alcoholic strength below 1,2 %.

- 14) ***How should the producer set the date of minimum durability? Will some guidance be issued on how to determine the date of minimum durability of de-alcoholised or partially de-alcoholised grapevine products?***

Concerning the date of minimum durability for de-alcoholised or partially de-alcoholised wines, Article 1(32)(a)(ii) of Regulation (EU) 2021/2117 modifies Article 119(1) of Regulation (EU) No 1308/2013 by introducing the obligation to display such date on the label of wines that have undergone a de-alcoholisation treatment and have an actual alcoholic strength by volume of less than 10 %. The date of minimum durability should be displayed in line with the rules provided for in Regulation (EU) No 1169/2011. Article 9(1)(f) of that Regulation requires that a food bears a minimum durability date or a 'use by' date. Article 24 of the same Regulation specifies in which cases a food is required to bear a 'use by' date. The decision on the duration of the shelf-life and the type of date to be used is under the responsibility of the food business operator. Annex X of the FIC Regulation lays down that the minimum durability date shall be expressed as 'best before' date and how the date shall be expressed.

It should be noted that, in order to support the consistency of date marking practices in market, at the request of the Commission, the European Food Safety Authority (EFSA) adopted guidance related to date marking⁽⁸⁾. In this guidance, EFSA developed a risk-based approach to be followed by food business operators when deciding on the type of date marking (i.e., 'best before' date or 'use by' date), setting of shelf-life (i.e., time) and the related information on the label to ensure food safety.

- 15) ***We have doubts how we can label wine in which the alcohol content was reduced by more than 20 % but the alcohol remains above the minimum amount allowed for the category 'wine' in the final product. Can we conclude that this kind of product cannot be put on the European market at all?***

Wines whose alcohol content was reduced by more than 20 % but still contain a level of alcohol above the minimum required for a specific wine category cannot be labelled as wines because they do not fulfil the conditions to be either a wine or a de-alcoholised/partially de-alcoholised wine. They could however be put on the EU market, but under a different sales designation which does not refer to wine, provided this does not mislead the consumer as to the true nature of the product.

- 16) ***Regarding the de-alcoholisation of wines with geographical indication (GI wines) we are not certain whether the producers are obliged to indicate in their product specification that partial de-alcoholisation is permitted for their GI wine if they want to use it. We ask for confirmation that this is the right interpretation and that the producers are obliged to amend their GI specifications.***

A distinction is to be made between the oenological treatment which corrects the alcohol content of wines and the one which leads to de-alcoholised or partially de-alcoholised wines.

⁽⁸⁾ <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2020.6306>

The former treatment was allowed in the EU as from 2013 for all types of wines except for organic wines. It aims to improve the balance of flavour of wines and it limits the alcohol reduction to a maximum of 20 % ⁽⁹⁾. The latter treatment, which has been more recently authorised in the EU, aims to create different types of wines, i.e. totally and partially de-alcoholised wines. For such treatment, Regulation (EU) No 1308/2013 does not set a maximum percentage of alcohol reduction. However, wines with a protected designation of origin (PDO) or protected geographical indication (PGI) cannot undergo a total de-alcoholisation and can thus only be partially de-alcoholised ⁽¹⁰⁾. Regulation (EU) No 1308/2013 also specifies in Article 94(2) that *'where the wine or wines may be partially de-alcoholised, the product specification shall also contain a description of the partially de-alcoholised wine or wines in accordance with the second subparagraph, point (b), mutatis mutandis, and, where applicable, the specific oenological practices used to make the partially de-alcoholised wine or wines, as well as the relevant restrictions on making them.'* Therefore, producers must modify the specifications of their PDO or PGI wines if they wish to produce a partially de-alcoholised version thereof.

⁽⁹⁾ Commission Delegated Regulation (EU) 2019/934, Annex I, Part A, Table 1, line item 12 and Appendix 8.

⁽¹⁰⁾ Article 92(1), second subparagraph, of Regulation (EU) No 1308/2013.