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Italian Wine Group Publishes First Guidance on E.U. Packaging Rules for Wineries

The advice says bottles filled before Aug. 12 require case-by-case proof of when packaging entered the market

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On Wednesday, Unione Italiana Vini published what it described as the first practical clarifications for wineries on how to apply the European Union’s new packaging rules, focusing on stock already in cellars, operator responsibilities, compliance documents and the use of QR codes on wine labels.

The guidance addresses questions that have emerged since the broader application of Regulation (EU) 2025/40 on packaging and packaging waste, known as PPWR, began on Aug. 12. According to UIV, the start of the new regime has created operational uncertainty for wine companies because the regulation does not include a general transition period and because many obligations depend on when packaging is considered to have been placed on the market.

That issue is especially important for the wine industry, where products may be bottled long before they are sold and where some wines remain in aging for extended periods. UIV said companies have been seeking clarity on how to treat bottles that were already filled and sealed before Aug. 12, as well as wines intended for long maturation.

In the guidance published through Il Corriere Vinicolo, UIV said one of the main points to emerge from its discussions with institutions is that the decisive factor is not simply the production date of the wine. Instead, the key test is the moment when the packaging is placed on the market. For wine that was already filled and closed before Aug. 12, UIV said documentation tied to the lot and the bottling closure may become especially important in showing the product's status. It added, however, that the assessment is not automatic and must be evaluated case by case based on the specific circumstances.

UIV said the clarifications followed several weeks of contacts at the European and national levels. After a Sept. 15 meeting between CEEV, the European wine industry body, and the European Commission, the Italian association said it convened a political, regulatory, technical and sustainability working table on Sept. 22 to collect and organize questions from member companies. That was followed by talks with Italy's Ministry of Environment and Energy Security, known as MASE, and a webinar on Oct. 5 held with Anformape and with the participation of Pietro Cucumile from the ministry's Directorate General for Circular Economy and Reclamation.

Among the subjects covered, UIV highlighted the distinction between the roles of manufacturer and producer under the new framework. It said the two qualifications can coexist within the same business but carry different obligations, a point that has practical consequences for wineries deciding who in the supply chain is responsible for

compliance tasks.

The association also pointed to questions around EU declarations of conformity, which are required under the new framework for certain packaging obligations. UIV said companies may be able to organize documentation by technically homogeneous packaging families rather than treating every package as a fully separate case, an approach that could reduce part of the administrative burden if accepted in practice.

Another issue involves digital information on labels. Wine companies have increasingly used QR codes to provide ingredient and nutrition information, and UIV said PPWR-related information can be combined with those existing digital tools as long as the different sections remain clearly separated. That point matters for producers trying to avoid label crowding while still meeting multiple EU disclosure rules.

UIV also said MASE has published an online self-assessment tool to help companies determine their legal qualification under the regulation and better understand their roles and responsibilities in the supply chain. For wineries that buy bottles, closures or other packaging from third parties, that kind of guidance may be important in deciding what records must be kept and which compliance steps fall to the packaging supplier or to the winery itself.

The stakes extend beyond legal interpretation. For wine producers and other beverage companies selling in the EU, the timing rules around market placement can affect packaging decisions, stock management and documentary controls. Businesses with inventories bottled before Aug. 12 may need to review how they prove when products were sealed and how they categorize existing stock, while companies planning future releases may need to rethink how packaging data is collected and stored. The treatment of QR code disclosures could also influence label design and digital compliance systems used across wine, beer and spirits.

UIV said the current clarifications are only an initial step and that the broader process of defining the European implementing acts remains open. That means wineries are still operating in an evolving regulatory environment, even as the first practical interpretations begin to emerge from talks with national authorities and industry groups.