

Wine Australia for Australian Wine

In market labelling and quality control guide for Australian wines bottled in China

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Content disclaimer

The information contained in this guide does not constitute professional advice and should not be relied upon as such. Whilst Wine Australia has sought external advice to verify the accuracy of the information contained in this guide, exporters are advised to liaise with their importers, wholesalers and distributors to ensure all labelling requirements are satisfied.

Exporters should be aware that interpretation of the rules may differ throughout China. Wine Australia recommends exporters consider seeking local independent advice prior to labelling products in market.

Wine Australia expressly disclaims all and any liability and responsibility to any person in respect of the consequences of anything done in respect of reliance, whether wholly or in part, upon this document.

Labelling items checklist¹

Items	Format	Minimum Height ²	Position	Language ³
1. Product name	e.g. 'dry still wine', 'brut sparkling wine'	1.8 mm	Same label as volume statement	Mandarin
2. Alcohol statement	e.g. 'Alcoholic strength 13.5% vol'	1.8 mm	Not specified	Mandarin
3. Volume statement	mL or L	4.0 mm*	Same label as product name	Mandarin
4. Country of origin	e.g. 'Source of raw wine: Australia'	1.8 mm	Not specified	Mandarin
5. Name and address of China agent	Chinese importer/agent/distributor name, address, contact info	1.8 mm	Not specified	Mandarin
6. Ingredient list	'Ingredients: grape juice, preservative sulphur dioxide [220]'	1.8 mm	Not specified	Mandarin
7. Date of manufacture	e.g. '2020 年 03 月 20 日'	1.8 mm	Not specified	Mandarin
8. Minimum durability date	{for wines with < 10% alc/vol}	1.8 mm	Not specified	Mandarin
9. Conditions for storage	e.g. 'Keep in cool and dry place'	1.8 mm	Not specified	Mandarin
10. Health warning	过量饮酒有害健康	1.8 mm	Not specified	Mandarin
11. Sugar content/product type	e.g. Must include 'semi-dry'/'sweet' in product name	1.8 mm	Not specified	Mandarin
12. Name and address of China bottling company	Chinese bottling company name, address, contact info	1.8 mm	Not specified	Mandarin
13. Production certificate number of China bottling company	食品生产许可证编号: SCXXXXX	1.8 mm	Not specified	Mandarin
14. Product standard	产品标准代号: GB/T 15037	1.8 mm	Not specified	Mandarin
15. Vintage, variety and geographical indication	Optional	–	Not specified	Mandarin
16. Allergen labelling (proposed)	'Contains egg and milk'	1.8 mm	Near the ingredient list	Mandarin

¹ This information is based on Chinese standards GB/T 15037-2006 and GB 7718-2011.

² Based on 750ml bottle size.

³ Any information presented in English (with the exception of registered trademarks and the manufacturer details on imported food) must be translated into corresponding Chinese characters of at least equivalent print height.

Important notes

In China, the bottling of bulk wine is a certified production step where the resultant packaged product is considered a domestic product. Accordingly, bulk wines bottled in China may not make country of origin claims such as 'Wine of Australia' or 'Product of Australia'. Labels may refer to Australia as the source of the raw material for example, 'source of raw wine: Australia' but this must be coupled with the indication of the Chinese bottling company's name and address.

If you are engaging a bottler in China, it is recommended that you confirm the bottler holds the relevant food production licence. You may also consider requesting evidence that the bottler hold is certified under quality management systems such as ISO 9000, HACCP and/or ISO 22000.

Bulk wine must be accompanied by documentation verifying the information set out in items listed 1 – 11 in the table above. Vintage, variety and geographical indication claims are optional, however, if the final labelled product will make any such claims, the bulk wine must be accompanied with this documentation verifying such claims.

All mandatory information must be presented in Mandarin, however dual language may also be used.

1. Product name

Format	<p>Wine may be classified by colour (red, white or rosé), by sugar content (see A11 below) and by carbon dioxide content. China prescribes the following categories for wine:</p> <ul style="list-style-type: none">• Still wine means a wine with carbon dioxide pressure less than 0.05 MPa at 20°C. Still wine may be of the following categories (defined in A11 sugar content below):<ul style="list-style-type: none">○ Dry still wines○ Semi-dry still wines○ Semi-sweet still wines○ Sweet still wines• Sparkling wine means a wine with a carbon dioxide pressure (produced naturally as a result of fermentation) of at least 0.35 MPa at 20°C. Sparkling wine may be of the following categories (defined in A11 sugar content below):<ul style="list-style-type: none">○ Brut sparkling wines○ Extra-dry sparkling wines○ Dry sparkling wines○ Semi-dry sparkling wines○ Sweet sparkling wines• Semi-sparkling wine means a wine with a carbon dioxide pressure (produced naturally as a result of fermentation) between 0.05 and 0.34 MPa at 20°C. The sweetness categories are per still wines.• Carbonated wine means a wine in which the carbon dioxide content is the result of partial or full artificial infusion. The sweetness categories are per still wines.• Liqueur wine means a wine with an alcohol content between 15.0% and 22.0% as a result of adding grape brandy, edible alcohol or grape alcohol as well as supplementary ingredients such as grape juice, concentrated grape juice, caramelised
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	<p>grape juice, white granulated sugar, into grape-based wines with alcohol content of 12.0% and above.</p> <ul style="list-style-type: none"> • Low alcohol wine means a wine produced from full or partial fermentation of fresh grapes or grape juice with special processing technology with an alcohol content between 1.0% and 7.0%. • Non-alcoholic wine means a wine produced from full or partial fermentation of fresh grapes or grape juice with special processing technology with an alcohol content between 0.5% and 1.0%.
Height	At least 1.8 mm
Position	Same label as volume statement

2. Alcohol statement

Format	<p>The alcohol format is prescribed. It should be indicated by the title of 'Alcoholic strength' and in the unit of '% vol', e.g.:</p> <ul style="list-style-type: none"> • Alcoholic strength 13.5% vol
Tolerance	+/- 1.0%
Height	At least 1.8 mm
Position	Can appear anywhere on the label

3. Volume statement

Format	<p>The volume must be shown in litres (L) or millilitres (mL). The statement must be marked as:</p> <ul style="list-style-type: none"> • net content: xxx ml (ml) (for bottle sizes under a litre) • net content: x Litres (l) (for bottle sizes over a litre) 	
Height	Net content in millilitres	Minimum height of font (mm)
	Less than or equal to 50	2.0 mm
	Greater than 50 and less than or equal to 200	3.0 mm
	Greater than 200 and less than or equal to 1000	4.0 mm (standard 750mL bottle)
	Greater than 1000	6.0 mm
Position	Same label as product name	

4. Country of origin

Format	<p>Wine imported in bulk for in-market packaging is considered a domestic product rather than an imported product after it has undergone bottling. The label cannot make country of origin claims such as 'Wine of Australia' or 'Product of Australia'. The label may make the following statements about the source of raw wine:</p> <ul style="list-style-type: none">• 澳洲原酒进口 (Source of Raw Wine from Australia)• 原酒产地: 澳大利亚 (Source of Raw Wine imported from: Australia)
Height	At least 1.8 mm
Position	Can appear anywhere on the label

5. Name and address of Chinese importer, agent or distributor

Format	<p>For imported food, the name, address and contact information (phone, email or website) of either the agent, importer or distributor that are registered with the competent authorities in China must be shown on the label. The company indicated must be registered according to the law and must bear legal liabilities for food quality and safety. The name and address of the manufacturer is optional (and need not be translated into Mandarin).</p>
Height	At least 1.8 mm
Position	Can appear anywhere on the label

6. Ingredient list

Format	<p>Raw materials/ingredients and additives must be declared. Ingredients must be headed or preceded by the word 'Ingredients'. Alternatively, the term 'Raw Materials' may be used for foods converted into other ingredients by fermentation (i.e. wine). In addition, food additives must be labelled in the list of ingredients by specific name of the additive or class name and INS e.g.:</p> <ul style="list-style-type: none">• Ingredients: grape juice, preservative sulphur dioxide (220)
Height	At least 1.8 mm
Position	Can appear anywhere on the label

7. Date of manufacture

Format	<p>The date of bottling is required. This cannot be applied as an over-sticker, supplement or amendment. It may be etched on the bottle provided a reference to the etched text appears on the label.</p> <p>The date must appear in sequence of: year – month – date as illustrated below.</p>
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	<ul style="list-style-type: none"> 2020 年03 月20 日 [2020 year – 03 month – 20 day]
Height	At least 1.8 mm
Position	Can appear anywhere on the label and may be etched on the bottle provided a reference to the etched text appears on the label

8. Minimum durability date

Format	Wines with an alcohol content of less than 10 % volume are required to include a minimum durability date. Quality guarantee date optional for wines above 10% vol.
Height	At least 1.8 mm
Position	Can appear anywhere on the label

9. Conditions for storage

Format	Any special conditions for the storage of the food should be declared on the label for example: Keep in room temperature/refrigerated/or in dark, or cool and dry place; Keep in xx – xx °C; please keep in cool and dry place; refrigerate after opening.
Height	At least 1.8 mm
Position	Can appear anywhere on the label

10. Health warning

Format	Mandatory on all alcoholic beverages. Required statement is 'Excessive drinking is harmful to health' in Mandarin: <ul style="list-style-type: none"> 过量饮酒有害健康
Height	At least 1.8 mm
Position	Can appear anywhere on the label

11. Sugar content

Format	As canvassed in item 1, the sugar content may be described by the product types indicated below or by stating the actual sugar content. Wine Australia recommends that you request your laboratory to report total reducing sugars, using the Lane-Eynon method, rather than glucose + fructose when labelling for China.	
	Product type	Sugar content (g/l)
	Still wine & carbonated wine	
	Dry	<ul style="list-style-type: none"> Less than or equal to 4 g/l sugar

	<ul style="list-style-type: none"> Or up to 9 g/l provided the total acid (expressed as g/l tartaric) is within 2 g/l of the sugar*
Semi-Dry	<ul style="list-style-type: none"> Between 4.1 g/l and 12 g/l sugar Or up to 18 g/l if the sugar content and acid content do not differ by more than 2 g/l
Semi-Sweet	<ul style="list-style-type: none"> Between 12.1 g/l and 45 g/l sugar
Sweet	<ul style="list-style-type: none"> Greater than or equal to 45.1 g/l sugar
Sparkling wine	
Brut**	<ul style="list-style-type: none"> Less than or equal to 12 g/l
Extra-Dry**	<ul style="list-style-type: none"> 12.1 – 17.0 g/l
Dry**	<ul style="list-style-type: none"> 17.1 – 32.0 g/l
Semi-Dry	<ul style="list-style-type: none"> 32.1 – 50 g/l
Sweet	<ul style="list-style-type: none"> Greater than or equal to 50 g/l
Height	At least 1.8 mm
Position	Can appear anywhere on the label

* For example, content of 6 g/L total acid with a sugar content between 4 - 8 g/L would qualify as 'Dry'.

**These categories attract a 3 g/L analytical tolerance.

12. Name and address of bottling company in China

Format	<p>Bottled wine is regarded as a domestic food in China. For domestic food, the name, address and contact information (phone, email or website) of the bottling company that are registered with the competent authorities in China must be shown on the label e.g.:</p> <ul style="list-style-type: none"> ‘灌装商: XXXXX (Bottling Company: XXXXX)’
Height	At least 1.8 mm
Position	Can appear anywhere on the label

13. Production certificate number of China bottling company

Format	<p>For China domestic food, the food production certificate number of the bottling company must be shown on the label. For example:</p> <ul style="list-style-type: none"> ‘食品生产许可证编号: SCXXXXX’
Height	At least 1.8 mm
Position	Can appear anywhere on the label

14. Product standard

Format	For China domestic food, the product standard must be shown on the label. For wine, the standard is: <ul style="list-style-type: none">‘产品标准代号: GB/T 15037’
Height	At least 1.8 mm
Position	Can appear anywhere on the label

15. Vintage, variety or geographical indication

[Vintage, variety and geographical indication](#) claims are all optional, however, if they are claimed they must meet the blending rules outlined in GB/T 15037-2006 and summarised in the table below:

Vintage	Variety(ies)	Origin(s)
80%	75%	80%

Ensure references to years do not mislead so they won't be interpreted as vintage claims and that references to registered GIs in label addresses do not mislead as to the origin of the wine.

Format	<ul style="list-style-type: none">葡萄采摘年份: 2015 年 (vintage: 2015)葡萄品种: 西拉 (variety: Syrah)巴罗莎产区 (origin: Barossa)
Height	Not specified but should be legible
Position	Can appear anywhere on the label

16. Allergen labelling (proposed)

The current version of GB 7718-2011 recommends labelling for the presence of allergenic substances. The draft GB7718-20xx will make allergens declarations mandatory when it enters into force. No date has yet been notified of when this standard will enter into force. The list of ingredient categories that requires an allergens warning include:

- Grains containing gluten and their products (such as wheat, rye, barley, oats, spelt or their cross-breeding strains)
- Crustacean and its products (such as shrimp, lobster, crab, etc.)
- Fish and its products
- Eggs and their products
- Peanut and its products
- Soybeans and their products
- Dairy and its products (including lactose)

h. Nuts and their products.

Note, sulphites are not recognised as allergens in China. Allergens can be labelled optionally using the following format:

Format	<ul style="list-style-type: none">• 本品含有鸡蛋和乳制品 (contains egg and dairy)• 配料: 葡萄汁, 鸡蛋, 牛奶 (Ingredients: grape juice, egg, milk)
Height	Not specified but should be legible
Position	Near the ingredient list or in bold

Loading, unloading and transportation of bulk wine

Exporters should refer to Wine Australia's [Bulk wine loading, unloading and transportation procedure](#) for guidance on quality control for shipping wine in bulk containers.

Engagement with bottlers

You should advise your customer of the vintage, variety and geographical composition of your wine to ensure the bottler can comply with Chinese labelling requirements even if the wine is blended with other components.

Although bulk wine bottled in China is regarded as domestic product (albeit with the possibility of being labelled as containing Australian wine as the raw material) any quality or safety problem with the final product could reflect badly on the reputation of Australian wine in general. Hence you may wish to advise your customer of the following recommendations:

1. The bottler should record the shipping container number in which the wine is received and have a system in place to uniquely identify each wine and to be able to trace it throughout the production process. The bottler should record at least the temperature, the alcohol level, and the sulphur dioxide content of the wine as received.
2. Nothing other than permitted materials (see Chinese National Standard GB 2760-2014) should be added to Australian wine. Records should be maintained of sulphur dioxide, or other adjustments.
3. Wine should be stored at less than 20° C in full vessels, or in extreme cases, where the vessel is not full, the wine should be protected by inert gas in accordance with Chinese legal requirements. Vessels used for storing wine should not be used for any other purpose.
4. Whilst many bottling facilities would have independently audited quality management systems, such as ISO 22000 or HACCP systems in place, an extremely critical element is to have a documented glass breakage procedure with all relevant staff trained in its application. The procedure should be easily accessible from all points where breakage may occur in the presence of open bottles. The key points in such a procedure should include:
 - a. Stop the production line immediately when a bottle breakage occurs.
 - b. Manually remove all broken glass and place in clearly labelled, covered bins.

- c. Remove and discard any open bottles in the filler/capper housing.
 - d. For at least two filler revolutions after re-start remove bottles from the affected head. Continue to remove until no fragments are sighted.
 - e. Records of time of breakage and relevant filler head must be retained. Supervisor should sign to verify the breakage procedure was correctly followed.
 - f. Neither compressed air nor high-pressure water should be used to clear broken glass.
5. If the wine is subsequently transferred to another facility within China it should be accompanied by copies of all relevant documents regarding its composition and provenance.

Enforcement for label breaches

Failure to comply with the relevant China GB standards for wine may result in enforcement action by the Chinese authorities. Enforcement options available to the authorities include:

- **Relabelling:** this option is only available for minor labelling deficiencies which are not related to product quality and safety (e.g. font size, typing errors, etc.)
- **Rejection or destruction of shipment by Customs:** this option will be used if the product cannot be relabelled, or the labelling deficiencies relate to the product quality or safety (e.g. errors in the ingredient list, lack of manufacturing date, misleading description etc).
- **Product recalls and financial penalty** for more serious violations by SAMR: SAMR views label deficiencies as related to failure to meet the quality or safety specification and standards and can lead to recall or financial penalty.

Authority	Label breaches	Enforcement
Customs (responsible for inspection of product upon arrival at the designated port)	Minor (not related to quality or safety)	Relabelling
	Others (usually related to quality or safety)	Rejection or destruction of shipment – more serious violations can result in blacklisting
State Administration for Market Regulation (SAMR) (responsible for in market inspection and supervision)	Minor	Relabelling
	Others (usually related to quality or safety)	Product recall Penalty (5,000-50,000 RMB if the value of goods is less than 10,000 RMB; 5-10 times the value of goods if the value of goods is more than 10,000 RMB)

Professional Consumer Complaints are usually from sophisticated individuals or groups that target products which do not comply with China's GB standards such as incorrect labelling and claims. Compensation could be up to 10 times the cost of a product. Therefore, it is very important to make sure your product complies with China's GB standards to avoid being targeted for compensation.

About Wine Australia

Wine Australia supports a competitive wine sector by investing in research, development and adoption (RDA), growing domestic and international markets and protecting the reputation of Australian wine.

Wine Australia is an Australian Commonwealth Government statutory authority, established under the *Wine Australia Act 2013*, and funded by grape growers and winemakers through levies and user-pays charges and the Australian Government, which provides matching funding for RDA investments.