



**BioGro Notification:**

Update on wine exports to Europe, wine additions & labelling, and BioGro certificates

**Date:** 04/04/2014

**Notification No:** 3

Dear winemaker

Please find attached our Wine Notification No3. In it you will find updates on:

- EU equivalence for wine under the MPI OOAP
- A guide to exporting wine to Europe using Import Permits
- Wine labelling requirements for EU
- Wine additions
- BioGro's new winery & wine certificates

**Updates**

We will keep you updated with further notifications when we receive any additional relevant information.

Please feel free to contact us directly if you have any questions.

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## Europe – Update on the inclusion of Wine under the Ministry of Primary Industries Official Organic Assurance Programme (MPI OOAP)

MPI have submitted an application but are unable to confirm at this stage when equivalence will be in place. We advise all wine producers and exporters to arrange for Import Permits to be in place by **30 June 2014** if they intend to export wine this year. We will notify you if the situation changes.

### Export Pathways for Europe and Import Permits

Currently, the only pathway for organic wine to be exported to the EU is by Import Permits. This will remain the situation until wine is included under the MPI Official Organic Assurance Programme (see above). The process for applying for an Import Permit is outlined below.

**An Import Permit, and the process to obtain it, is crucial for a BioGro-certified exporter to export organic wine produced in 2013 (and in some cases 2012 or earlier wines) to the EU. At the date of this notification, our understanding is that Import Permits will no longer be issued after 30 June 2014, so it is important you apply for these as soon as possible.**

### Import Permit

An Import Permit is a document issued by the competent authority of a European Union Member State to an importer (based in that member state) to import organic wine from New Zealand.

1. Vintages affected:  
All organic wines produced in 2013 (and some 2012 wines or earlier, see Wine notification No1) and labelled as “organic wine”
2. Applicable countries:  
All member states of the European Union.
3. Parties involved in process:
  - Exporter certified by BioGro
  - EU-certified importer (in the EU Member State)
  - Competent Authority in the import country (eg DEFRA = Department for Environment, Food and Rural Affairs for the UK)
  - Certification Bodies (Control bodies):
    - BioGro (certifier of the exporter in NZ)
    - Certifier of the Importer in the EU Member State (eg Ecocert, Soil Association)
4. Key Documents:
  - **Initial application to market an organic wine from Third Country.**  
This form is obtained by the importer from the competent authority in the EU country where your wine is intended to be imported into.
  - **Import Permit**  
Issued by the competent authority in the EU country that your wine is being imported into. The import permit is specific to:
    - A product or a list of product (eg organic wine(s))
    - The importer. Typically the importer who applied for the permit.
    - Valid to: Import Permits are issued for a period of 12 months.
  - **Certificate of Inspection (Col)** or export consignment certificate:  
Issued by BioGro to the BioGro certified exporter prior to shipping the consignment of wine. It is critical that the exporter apply to BioGro for a Col for each consignment before export.

*Note: It is our understanding that once the wine has been imported into Europe, you do not need to obtain another permit to move the wine from the importing EU country to another EU country. However, a new Import Permit is required if a wine, that has been issued an Import Permit, is imported by a different importer and / or another EU country.*
5. Timeframe:  
Please contact your importer to confirm the timeframe for an Import Permit to be issued. Our experience is that it can take up to 2 months.

6. Step by step guide:
- Contact your importer to obtain an application for an Import Permit from the Competent Authority for the intended import country. Your importer must be certified as an organic importer / handler by a recognized Certification Body in EU. You must list the organic wine(s) you intend to export in the application
  - Send the application for an import permit to BioGro to complete the relevant section ([exportcerts@biogro.co.nz](mailto:exportcerts@biogro.co.nz)). BioGro will send the application for an import permit (original copy) back to the importer who will complete and sign.
  - The EU importer applies for an Import Permit to the Competent Authority in Member State.
  - The Import Permit is issued. A copy is sent to the EU Importer. Obtain and send a copy to BioGro.
  - Before shipping the wine, the BioGro certified exporter applies to BioGro ([exportcerts@biogro.co.nz](mailto:exportcerts@biogro.co.nz)) for a Certificate of Inspection (Col). Once the completed request for a Col has been received, BioGro will issue an electronic export consignment certificate within 2 business days, and post the original document. The electronic copy is generally sufficient for custom / port authorities.
  - The Certificate of Inspection must accompany the shipment for customs clearance in the EU.

**Important:** if you or your importer have not received an Import Permit for the wine at the time of shipment, you may decide at your risk to go ahead with the export and apply for a Col from BioGro. It is critical the Import Permit is issued before the consignment arrives at destination port, or the Col will not be signed off by the Port Authorities / Customs and the consignment will not be cleared for importation.

### Labelling for the EU and use of the EU logo

All wine produced in 2012, 2013 and 2014 labelled as "Organic Wine" and made in compliance with EC 203/2012 must be labelled according to the EC 834/2007.

You must include on the label:

- The statement "organic wine"
- The EC certifier code.
- The BioGro logo. Please follow BioGro use guideline available on the website: [www.biogro.co.nz/logo-use-rules](http://www.biogro.co.nz/logo-use-rules)

Optional to use on the label:

The EU logo: if used, please follow the EU logo rules available on the EC website:

[http://ec.europa.eu/agriculture/organic/downloads/logo/index\\_en.htm](http://ec.europa.eu/agriculture/organic/downloads/logo/index_en.htm)

Please note that if you chose to display the EU logo on the wine label you must also display the "place of origin" statement as shown in the EU guideline. Please consult the FAQ and user manual on EU website for more information: [http://ec.europa.eu/agriculture/organic/documents/logo/user\\_manual\\_logo\\_en.pdf](http://ec.europa.eu/agriculture/organic/documents/logo/user_manual_logo_en.pdf)

Please send all labels to [approvals@biogro.co.nz](mailto:approvals@biogro.co.nz) for approval

### Wine additions updates

Please refer to the **Table 1: Permitted additives and processing aids for wine**

Changes to the previous table:

- organic milk for clarification may no longer be used for organic wine to the EU. Casein or potassium caseinate may be used instead
- silicon dioxide may not be used for wine "made with organic grapes" for the US.

Please remember to complete your wine additions application and send to [approvals@biogro.co.nz](mailto:approvals@biogro.co.nz) for approval

**Sulphur restrictions** - Table 2 (below) summaries the sulphur limits for specific markets.

### New Winery certificate

As notified in November we have changed our winery and wine certificates. Once we have received your completed wine list for 2014 we will issue your wine certificate as an Annex to the winery certificate. You no longer need to send wine notes for wine certificate issue.

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**Table 1: Permitted additives and processing aids for wine**

Product		Standard or Regulation <sup>(1)(2)</sup>				Conditions
		BioGro and unregulated markets	EU (EC 203/2012)	USA (USDA NOP)	Canada (COR)	
Inoculants	Yeasts	✓	✓	✓	✓	Non-synthetic only. Growth on petrochemical substrate and sulfite waste liquor is prohibited (NOP and COR)
	Malolactic bacteria	✓	✓	✓	✓	
Extraction aids	Pectolytic enzymes	✓	✓	✓	✓	Derived from edible, non-toxic plants, nonpathogenic fungi, or non-pathogenic bacteria (NOP and COR)
Yeast nutrients	Yeast hulls / yeast cell walls	✓	✓	✓	✓	Max 40g/hl (EC 203/2012)
	Autolysed yeast	✓	X	✓	✓	
	Thiamine hydrochloride (vitamin B1)	✓	✓	✓	✓	
	Other vitamins	X	X	✓	X	
	Diammonium phosphate (DAP)	X	✓	X	X	
Chaptalisation / enrichment	Sugar <sup>(3)</sup>	✓	✓	✓	✓	Must be certified organic <sup>(3)</sup>
	Grape juice concentrate	✓	✓	✓	✓	Must be certified organic
Acid regulation	Potassium bicarbonate	✓	✓	X	X	
	Calcium carbonate	✓	✓	✓	✓	
	L-Tartaric acid	✓	✓	✓	✓	Non-synthetic (COR). Made from grape wine only (NOP)
	Lactic acid	✓	✓	✓	✓	
	Citric acid	✓	✓	✓	✓	Produced by microbial fermentation of carbohydrate substances (NOP and COR)
	L-Malic acid	✓	X	✓	✓	
	Alginic acid	✓	✓	✓	✓	
Clarification	Egg whites	✓	✓	✓	✓	Must be certified organic
	Egg white lysozyme	✓	X	✓	✓	

Product		Standard or Regulation <sup>(1)(2)</sup>				Conditions
		BioGro and unregulated markets	EU (EC 203/2012)	USA (USDA NOP)	Canada (COR)	
	Milk	✓	X	✓	✓	Must be certified organic
	Isinglass	✓	✓	X	✓	
	Casein	✓	✓	X	✓	From organic source if available (COR). Allowed in USA for “wine made with organic grapes” if non-synthetic.
	Potassium caseinate	✓	✓	X	X	
	Bentonite	✓	✓	✓	✓	
	Kaolin	✓	X	✓	✓	
	Pea or wheat protein	✓	✓	✓	✓	Organic source w/out use of synthetic solvents (NOP,COR)
	Silicon dioxide	✓	✓	X	✓	
	Gelatine	✓	✓	✓	✓	From org source if avail, & free of “animal risk material” (COR)
	Gum arabic (Acacia gum)	✓	✓	✓	✓	From org source if available (EU and NOP). Water extracted only (NOP). Extracted using water or permitted materials only (COR)
	Tannins / tannic acid	✓	✓	X	✓	From org source if avail. H2O, alcohol or acid extraction (COR)
Stabilisation	Potassium bitartrate (cream of tartar)	✓	✓	✓	✓	Non-synthetic if commercially available (COR)
Filtration	Perlite	✓	✓	✓	✓	
	Diatomaceous earth	✓	✓	✓	✓	
	Activated carbon	✓	✓	✓	✓	“Activated charcoal” from vegetative sources only (NOP)
	Cellulose	✓	✓	✓	✓	Must not be chlorine bleached (COR)
Sulphide reduction	Copper sulphate	✓	✓	X	X	Only allowed until 31/7/15 (EU)
	Copper citrate	✓	✓	X	X	

Product		Standard or Regulation <sup>(1)(2)</sup>				Conditions
		BioGro and unregulated markets	EU (EC 203/2012)	USA (USDA NOP)	Canada (COR)	
Preservatives / antioxidants	Potassium metabisulphite (PMS)	✓	✓	X	✓	Restrictions to final sulphites: see separate table
	Sulphur dioxide gas (SO <sub>2</sub> )	✓	✓	✓	✓	Restrictions to final sulphites: see separate table
	Ascorbic acid	✓	✓	✓	✓	Non-synthetic if commercially available
Flavouring agents	Oak products (chips/staves/beans)	✓	✓	✓	✓	
Sparging / creating inert environment	Nitrogen	✓	✓	✓	✓	Oil free grades only (NOP and COR)
	Argon	✓	✓	X	✓	
	Carbon dioxide (CO <sub>2</sub> )	✓	✓	✓	✓	
	Ozone	✓	X	✓	✓	Allowed as a barrel sanitising agent, all markets including EU
	Oxygen	✓	✓	✓	✓	Oil free grades only (NOP and COR)

Notes to the Table:

- (1) **China, Brazil, Taiwan and South Korea** are also regulated markets for organic products. For more information about legal access to these markets for organic wine, please contact the BioGro office.
- (2) **Japan** is not regulated for organic wine, even though Japan is regulated for other organic products (under Japan's JAS law). BioGro Standards 2009 apply.
- (3) Organic sugar is permitted if added pre-fermentation. It is not clear whether there is any allowance for the use of non-organic sugar in the event that organic sugar is not available or is unacceptable for technical reasons. Until we have further clarification about this, we recommend that only organic sugar is used.

**Table 2: Sulphur limits**

	BioGro and unregulated markets	EU (EC 203/2012)	USA (USDA NOP)	Canada (COR)
Dry wine	Wines with <5g/L residual sugar: Limit <b>150mg/L</b> total sulphur	Red wines with <2g/L residual sugar: Limit <b>100mg/L</b> total sulphur  Red wines with >2g/L and <5g/L residual sugar: Limit <b>120mg/L</b> total sulphur  White and Rosé wines with <2g/L residual sugar: Limit <b>150mg/L</b> total sulphur  White and Rosé wines with >2g/L and <5g/L residual sugar: Limit <b>170mg/L</b> total sulphur	All wines labelled “made with organic grapes”: Limit <b>100mg/L</b> total sulphur  All wines labelled “organic”: No sulphites allowed to be added in production.	Wines with <50g/L residual sugar: Limit <b>100mg/L</b> total sulphur and <b>30mg/L</b> free sulphur
Medium wine	Wines with 5-30g/L residual sugar: Limit <b>200mg/L</b> total sulphur	All other wines: Limit <b>30g/L less than</b> the legally permissible limit defined in part A Annex 1 B of EC regulation 606/2009.		
Sweet wine	Wines with >30g/L residual sugar: Limit <b>250mg/L</b> total sulphur	<b>Therefore:</b> Red wines with >5g/L residual sugar: Limit <b>170mg/L</b> total sulphur  White and Rosé wines with >5g/L residual sugar: Limit <b>220mg/L</b> total sulphur  All quality sparkling wines: Limit <b>155mg/L</b> total sulphur  Liqueur wines with <5g/L residual sugar: Limit <b>120mg/L</b> total sulphur  Liqueur wines with >5g/L residual sugar: Limit <b>170mg/L</b> total sulphur  Certain sweet white wines, as defined in Part A Annex 1 B of EC 606/2009: Limit <b>270mg/L - 370mg/L</b> total sulphur		Wines with 50-100g/L residual sugar: Limit <b>150mg/L</b> total sulphur and <b>35mg/L</b> free sulphur  Wines with >100g/L residual sugar: Limit <b>250mg/L</b> total sulphur and <b>45mg/L</b> free sulphur