

EN

P-004004/2025

Answer given by Mr Hansen

on behalf of the European Commission

(13.11.2025)

Beverages containing more than 1.2% vol. of alcohol are exempted from the mandatory indication of the list of ingredients and the nutrition declaration¹. This exemption does not apply to wine in accordance with an amendment to Regulation (EU) No 1308/2013², which provides also for the possibility to use electronic means. While the 2017 Commission report invited the alcoholic beverages industry to present a self-regulatory proposal before taking further action³, the list of ingredients and the nutrition declaration became compulsory for all products of the wine sector and aromatised wine products in 2021.

Regulation (EU) No 1169/2011, in Article 12(3), provides for the possibility to allow expressing certain mandatory particulars by means other than the physical label. In line with Article 1(4) of that Regulation, Articles 118 to 121 of Regulation (EU) No 1308/2013 lay down the specific labelling requirements applicable to wine. Providing information by electronic means instead of on the physical label is voluntary for wine producers, and key information (*i.e.* energy value, allergens) must always be indicated on the physical label. Pesticides are not compulsory information to consumers.

The use of electronic means in wine labelling is subject to limitations and conditions, and the information so provided electronically should be clear for consumers⁴. QR codes are not compulsory but a universal electronic means to access information, in line with international requirements on labelling using technology⁵, *i.e.* sufficient technological infrastructure available; widespread, adequate and easy access to the electronic means; and reasonable for consumers to use them during normal and customary circumstances of purchase and use.

¹ Article 16(4) of Regulation (EU) No 1169/2011 - <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02011R1169-20250401>.

² Regulation (EU) 2021/2117, of 2 December 2021 - <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32021R2117>.

³ COM(2017) 58 final - https://food.ec.europa.eu/document/download/b4dcc4f8-215c-4a7f-ac6c-de5cab8fbf2e_en?filename=fs_labelling-nutrition_legis_alcohol-report_en.pdf.

⁴ C/2023/1190 - <https://eur-lex.europa.eu/eli/C/2023/1190/oj/eng>.

⁵ Codex Alimentarius Guidelines on the use of technology to provide food information in food labelling (2024) - https://www.fao.org/fao-who-codexalimentarius/sh-proxy/es/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FStandards%252FCXG%2B105-2024%252FCXG_105e.pdf.