



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B – Sustainability

Brussels

Dear [REDACTED],

I would like to thank you for your email¹ of 8 April 2022 regarding the labelling of non-organic wine made with 100 % of organic grapes.

Wine is included in the scope of Regulation (EU) 2018/848² and specific detailed production rules are included in Part VI of Annex II of this Regulation. Those rules provide, in particular, that the wine is produced from organic grapes and with a limitation as regards the use of products, substances and oenological practices.

In accordance with Article 30(1) of Regulation (EU) 2018/848, the use of terms referring to organic production is restricted to products complying with this Regulation. The first subparagraph of Article 30(2) of this Regulation confirms that such terms cannot be associated with wine not complying with the detailed organic production rules mentioned above.

Under certain conditions, article 30(5), point (b), of Regulation (EU) 2018/848 provides the possibility to use a term referring to organic production in the list of ingredients of a wine when less than 95 % of the agricultural ingredients of the product by weight are organic.

Without prejudging your assessment of the concrete situations at stake behind your question, I would like to draw your attention to the objective of providing the information to consumers and to the fact that, as stated in Article 30(2) of the above mentioned regulation, *“no terms (...) shall be used in the labelling or advertising if they are liable to mislead the consumer or user by suggesting that a product or its ingredients comply with this Regulation”*.

On the basis of the information available and subject to on-the-ground assessment of the products at stake (this assessment falls under national responsibilities), I would conclude that the mentions of “wine from organic grapes” and “product containing less than 95 %

¹ ARES(2022)2956975

² [Regulation \(EU\) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation \(EC\) No 834/2007 \(OJ L 150, 14.6.2018, p. 1\)](#)

organic ingredients”, as suggested in your e-mail, cannot be used in the sales description for a non-organic wine made with organic grapes. There is no possibility to refer to organic production in the label of such a wine and the label should correspond to the label of a conventional wine.

The present opinion is provided on the basis of the facts as set out in your email of 8 April 2022 and expresses the view of the Commission services and does not commit the European Commission. In the event of a dispute involving Union law it is, under the Treaty on the Functioning of the European Union, ultimately for the European Court of Justice to provide a definitive interpretation of the applicable Union law.

Yours sincerely,

