

U-LABEL

QUESTIONS & ANSWERS ON THE WINE AND SPIRITS E-LABEL PLATFORM

QUESTIONS ON THE FRAMEWORK – WINE AND AROMATISED WINE PRODUCTS

1. WHAT HAS CHANGED IN THE WINE AND AROMATISED WINE LEGISLATIONS?

New specific labelling rules applicable to wine and aromatised wine products will be adopted by the EU institutions in fall 2021, in the framework of the reform of the EU Common Agricultural Policy (CAP). These new labelling measures will require wine and aromatized wine products to communicate, on a mandatory basis, the list of ingredients and the nutrition declaration either on the label or through a digital support.

2. WHEN WILL THESE NEW MANDATORY LABELLING RULES APPLY?

The EU Common Agricultural Policy (CAP), which includes new labelling rules, will be adopted by the EU institutions in fall 2021. As from the end of the two-year transitional period following the adoption, all wines and aromatised wine products commercialised in the EU market will have to communicate the list of ingredients and the nutrition declaration.

3. WHAT NEW INFORMATION MUST BE DECLARED?

All wines and aromatised wine products commercialised in the EU market will have to communicate the list of ingredients and the nutrition declaration per 100 ml.

4. HOW CAN THIS NEW INFORMATION BE DECLARED?

The new mandatory information can be communicated to consumers either directly on the physical label of the product or electronically, through a digital label (e-label). In case the nutrition declaration is provided digitally, the energy value of the product should appear on the label. If the list of ingredients is provided digitally, a reference to the allergenic substances should be maintained on the label.

5. HAS THE EU WINE SECTOR BEEN SUPPORTIVE OF THESE CHANGES?

The EU wine sector has been asking proactively to the EU institutions the adoption of the new mandatory rules to respond to consumers expectations and increase transparency while harmonising an adapted communication on wines and aromatised wine products. The inclusion of rules under the Common Agricultural Policy packages is an opportunity to demonstrate the wine sector's commitment to fulfil consumers' expectations and modernise consumer information.

QUESTIONS ON THE FRAMEWORK – SPIRIT DRINKS

6. WHAT IS THE LEGAL FRAMEWORK FOR CONSUMER INFORMATION FOR SPIRIT DRINKS?

Spirit drinks, like all alcoholic beverages above 1.2% ABV, are exempted from the general rule under the Food Information to Consumers (FIC) Regulation to provide nutrition information and ingredient listing on the label of food stuffs. Following constructive discussions with the European Commission, and in line with the sector's firm commitment to transparency and clarity, the spirits sector agreed to provide this information for spirit drinks sold in the EU, as captured in the [Memorandum of Understanding on the Provision of Nutrition Information & Ingredients](#)

[Listing of Spirit Drinks sold in the EU](#) (hereinafter referred to as "MoU"). The MoU sets out a range of concrete commitments on the provision of the energy value and list of ingredients for spirits drinks. It further includes several specific principles and rules with regards to the questions of how, and by when, energy information will be provided on the label and in which manner ingredients will be listed online, as facilitated by the E-Label Platform.

QUESTIONS ON THE E-LABEL CONCEPT

7. WHAT IS AN E-LABEL?

An e-label is a dedicated webpage compiling structured information on a precise product, for a specific market. The e-label is made available to consumers through a unique QR-code printed on the back-label of the product. By scanning the QR-code with a smartphone, consumers are directly led to the e-label of the product they have scanned, in the appropriate language, defined through geo-localisation.

8. WHAT INFORMATION DOES THE E-LABEL CONTAIN?

— For wine and aromatized wine products, each e-label contains a set of mandatory indications imposed by EU legislation and some voluntary indications that the company may decide to add or not. Mandatory indications include basic product characteristics (name, image, product category, country of provenance), the list of ingredients, the nutritional declaration per 100ml, a pictogram warning against drinking during pregnancy and a generic message about responsible consumption.

— For spirit drinks, no legal obligations to provide any information online are applicable. Background for the provision of consumer information online is the spirits sector's [Memorandum of Understanding](#) on the provision of consumer information, dating back to 2019. Members of spiritsEUROPE agreed to always include on the e-label basic product characteristics (name, image, product category, ABV, net quantity).

In addition to these (mandatory) indications, companies may decide to provide extra information such as additional product characteristics (regulated under EU law), nutrition declaration per portion (and 100ml for spirits), other health warning pictograms or messages, sustainability certificates and recycling information as well as basic information about the company (name, logo and website).

The e-label does not contain any type of marketing information and users of the e-label will not receive targeted advertisements after scanning QR-codes generated with the U-Label platform.

QUESTIONS ON THE U-LABEL PLATFORM FUNCTIONING

9. WHAT SERVICES ARE PROPOSED BY U-LABEL?

U-label offers a secured and trusted environment that allows companies to easily start building their digital information strategy and provide clear, relevant and accurate information to their consumers. The U-label platform offers, at an affordable price, some unique features that will make it considerably easier for companies to embark on this digital journey:

- Integrated expertise on EU legal requirements for wine, aromatised wine and spirits products labelling;
- Automatic translation of all structured information into 24 EU languages;
- Instantly adaptable content;
- Complete autonomy for companies to create new e-labels and manage existing e-labels.

10. WHAT IS THE GEOGRAPHICAL SCOPE OF THE U-LABEL PLATFORM?

The U-label platform currently allows to create e-labels for products marketed in the EU only. These e-labels are fully compliant with EU legislation and can be made available to consumers in all official languages of the EU thanks to the automatic translation feature of the platform.

Soon, the scope of the platform will be extended to cover also non-EU markets (UK, Switzerland, ...), with e-labels containing information that is relevant for each destination market and available in appropriate languages.

11. HOW IS AN E-LABEL CREATED IN THE PLATFORM?

Once subscribed to the platform, any company can start creating e-labels for wine, aromatised wine or spirits drinks products. Information on the product can be inserted either manually by following the step-by-step process, or automatically by absorbing information from an existing database (GS1). Whichever the input mode, companies can enter as little or as much optional information as they wish and decide which indications to show on the final e-label.

After all relevant data has been entered by the user, the system automatically translates the e-label into all 24 EU official languages, unless the user decides to select only some of them. The user is then invited to check and validate each linguistic version before finalising the process and downloading the unique QR-code.

12. HOW IS THE INFORMATION TRANSLATED?

When creating an e-label, all structured data selected can be translated automatically by the platform in all EU official languages, thanks to an extensive multilingual database integrated within the platform. Any free text that is manually entered by the user, however, will not be automatically translated by the system, but can be manually translated by the user in any EU language when reviewing the different linguistic versions of the e-label.

13. CAN THE CONTENT OF AN ALREADY EXISTING E-LABEL BE CHANGED?

Yes. The content of an e-label can be modified at any time through the company's U-label account. Once saved, the changes are instantly implemented and visible to any consumer scanning the QR-code corresponding to this e-label.

14. IN WHICH LANGUAGE CAN I CREATE MY E-LABEL?

An e-label can be created in any of the 24 official languages of the EU. The automatic translation feature of the platform can then be used to generate the e-label in all the other EU official languages, or only in some of them, depending on the company's needs. Additional linguistic versions of an existing e-label can be added or removed at any time.

QUESTIONS ON THE PROJECT

15. WHAT IS THE U-LABEL PLATFORM?

The U-label platform is an online tool created to support wine and spirits companies in providing EU consumers with relevant, accurate and detailed information about their products by means of an e-label, accessible to consumers through a QR-code printed on the back-label of the bottle.

With the U-label platform, any company, including small- or micro-ones, can benefit from the legal and technical expertise needed to generate e-labels in all EU official languages, in the most efficient and cost-effective way and easily face the recent changes in the EU legislation

16. WHO CREATED U-LABEL?

The U-label platform was created by a specialised IT company, in close collaboration with the EU associations representing respectively the European wine and aromatised wine companies (CEEV) and the European spirit drinks producers (spiritsEUROPE), to combine cutting-edge expertise in the IT and digital field with an in-depth knowledge of the European legal framework applicable to wine and spirits products, which are at the very heart of the initiative.

Although the creation of the platform was jointly financed by the IT company together with CEEV and spiritsEUROPE, the U-label platform is owned by the IT company and CEEV and spiritsEUROPE will not receive any revenue from the U-label platform.

17. WHO CAN JOIN U-LABEL AND CREATE E-LABELS?

The U-label platform is open to any wine or spirit drinks company, whether or not a member of CEEV and/or spiritsEUROPE, and whether based in the EU or not, wishing to create e-labels to provide information to their EU consumers. From micro-companies to multinationals, any company will find in the U-label platform an adapted and affordable solution to boost their digital information strategy.

18. HOW MUCH DOES IT COST TO USE THE U-LABEL PLATFORM?

The use of the U-label platform is subject to the payment of an annual subscription plan. The platform offers a range of three subscription plans, to best fit each company's needs and means, in particular for SMEs. Each subscription plan includes the access to the platform for one year, the creation of a certain number of new e-labels, and the maintenance of a certain number of already existing e-labels. Companies may upgrade their subscription plan at any time during the year.

Subscription plan	BASIC	PLUS	PREMIUM
Creation of new e-labels (up to)	20	100	Unlimited
Maintenance of existing e-labels (up to)	60	200	Unlimited
Annual cost (VAT excluded)	250 €	600 €	2.500 €

19. HOW DOES THE U-LABEL PLATFORM WORK FOR CONSUMERS?

By scanning the QR code printed on the back-label of a bottle with a smartphone, consumers are directly led to the corresponding e-label, in their own language thanks to geo-localisation. Consumers may manually switch, at any time, to any other available language.

In case the language corresponding to the geo-localisation of the consumer has not been activated by the company when creating the e-label, the e-label will be displayed by default in the original language of creation of the e-label.

20. WILL CONSUMERS HAVE TO PAY TO ACCESS THE INFORMATION?

No. Accessing e-labels on the U-label platform is free of charge and does not require the consumer to subscribe to the platform or create any account whatsoever.

21. ARE CONSUMERS TRACKED WHEN VISITING AN E-LABEL?

No, consumers are not tracked when viewing an e-label on the U-label platform. Their geographical position, however, is determined, in order to ensure them the best possible experience and direct them to the appropriate linguistic version of the e-label.