

WAREHOUSE DOCUMENTARY CHECKS

1. Inspections by Wine Standards

WSB Inspectors carry out checks during visits to premises where wine is held, in order to examine documentation required for the shipment of wine from Member States and Third Countries. **This documentation is described in paragraph 3.**

WSB Inspectors are entitled under the Wine Regulations to see this compulsory documentation to check that it is genuine, correctly completed and approved (where stipulated) by an issuing authority in the country of production. In addition, information may be compared to stocks of wine held at the premises.

If details recorded on documentation are incomplete or inaccurate or if there are faults with the labelling of the wine, the trader or owner of the premises will be advised and instructed to carry out immediate or future corrective action.

NB - Where stocks of a faulty wine have inadvertently been released (prior to discovery of the fault), instructions for corrective action may entail slip labelling at several different locations or consolidation of stocks.

2. Bottler / Bond / Warehouse / Trade checks

It is in the interests of traders (wholesalers / importers / bottlers etc) to plan their own regular programme of checks on accompanying documentation and wine shipments, to discover any infringements and avoid any unexpected subsequent movement controls on the wine by the WSB and other authorities that may also involve additional labelling costs or major recalls.

Bonded warehouses are also well placed to carry out these checks on behalf of their own stocks and trade customers, if they wish to offer this service. (Checks may also be a condition of the Bond Approval by HM Revenue and Customs).

3. VI1 & Administrative Accompanying Document (AAD) documents

Under wine regulations, there are 2 principal documents for the shipment of wines into the UK.

- a. The certificate of origin and analysis, known as the **VI1**, for Third Country wines.
- b. The **AAD** is used for movement of EC wines under bond, often from another country. For internal UK movement the W8 (required by HM Revenue and Customs) is the equivalent form.

3.1 VI1

The original document and a copy must accompany the wine and comply with the model set out in the Regulation and signed by the issuing authority in the originating Third Country (or an approved producer in Australia or USA). The European Commission publishes a list of authorities and producers: see the Lists page on the Commission website in Agriculture and Rural Development section http://ec.europa.eu/agriculture/markets/wine/lists/index_en.htm . Information should be

accurate, especially analytical data (Box 11) and not contravene limits set out in European Commission regulations.

- The certificate of origin section should give a description of the wine (Box 6) as stated on the label (see Regulation 555/2008 Annex XI), which is validated by the signature and stamp of the issuing authority.
- The Analysis section lists several tests carried out by an approved laboratory. 4 of these tests will give figures that are subject to limits specified for wines marketed in the European Community.

- a. **Maximum total alcoholic strength (still wine)*** 15% vol
- b. **Minimum actual alcoholic strength** 9% vol
- c. **Maximum total sulphur dioxide** 150mg/l dry red wine
200 mg/l dry white wine

(NB – For other sweeter wines – consult the WSB)

- d. **Minimum total acidity (tartaric)** 3.5 grams/litre

* Test not required for wines from Australia and USA: only b-d must be completed

NB exemptions

Some Third Countries have bilateral Agreements with the European Community that allows them to import into the EU specified wines exceeding 15% total alcohol. They include Australia (late harvest wines), Canada, Chile and South Africa. There are also a few exceptions to the 9% actual alcohol limit (including Canada and South Africa).

3.2 AADs - Accompanying documents (European Union)

Wines from other Member States (and Third Country wines once these have entered free circulation) are usually transported under bond (duty suspension) using the Administrative Accompanying Document (AAD).

Although primarily intended for a range of products subject to Excise duty (Regulation 2719/92 refers) this is also required through wine sector regulations to describe a Protected Designation of Origin (PDO) wines (e.g. Denominacion de Origen or Qualitatswein) and a Protected Geographical Indication wine (e.g. Vin de Pays and Indicazione Geografica Tipica) and includes the phrase

This document certifies the protected designation of origin/protected geographical indication of the wines set out herein

There should also be a full description of the wine (as labelled) that allows definite identification with the labelled wine.

NB - Unlike the VI1 form, analysis details are not included, apart from the actual alcohol: this must be $\pm 0.2\%$ tolerance.

4. Suggested methods of carrying out checks

- Use of digital cameras is recommended to photograph labels, to compare with VI1 description and alcohol details.
- Other methods can be used – e.g. photocopying labels with compulsory information **to include the actual alcohol figure.**

- Noting Delivery / Receipt documents by bond / warehouse staff that are subsequently checked by the Bond / Warehouse / Bottler's Laboratory staff against VI1 / AAD information or Laboratory analysis at "Pre- bottling" stage.

5 Illustrations:

a) Alcoholic strength discrepancy

If a wine label states 11.5% (labelled strength should be shown as 0% or 0.5%) this should usually be reflected by a VI1 or AAD stating a minimum 11% and maximum 12%.

e.g. label states 12%, VI1 or AAD gives actual alcohol at 11.2%.

This is outside the standard permitted tolerance* and should be notified to the WSB. Independent analysis may be required in order to demonstrate actual alcoholic strength, which may allow the wine to be legally marketed. An analytical tolerance of 0.1% vol is allowed.

PDO wines more than 3 years old and sparkling wine are permitted a labelling tolerance of 0.8%

b) Alcohol statement

Wines from Third Countries should in general not exceed 15% vol total alcohol (Note - Liqueur or 'fortified' Wines are treated separately).

NB - If a figure greater than 15% (total or actual alcohol) is shown on the VI1 form or label, the WSB should be notified. Minimum actual alcohol is usually 9% vol.

e.g. a VI1 shows total alcohol of 15.3% while the label states 15%.

Although the label is showing alcohol to the nearest 0.5%, as required, the total alcohol figure indicates that the wine has been illegally imported and must not be marketed.
