



# FIVS & THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

## Walking the Talk

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FIVS | 2020



We would like to acknowledge, past and present, all of those within the FIVS family who have provided invaluable support through their work with our Presidential Council, Working Groups, Committees, Membership, and Secretariat.

FIVS  
Launched on 27 October 2020



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# 1. INTRODUCTION



# 1. Introduction

In 2015, all 193 United Nations (UN) Member States unanimously adopted [17 Sustainable Development Goals](#) (SDGs) pledging to end poverty, protect the planet, and secure peace and prosperity for everyone around the world by 2030. The achievement of the 17 goals, and the 169 associated targets, relies on close collaboration between the private and public sectors to advance towards global environmental, social and economic sustainability. The SDGs also provide a universal language for all actors to discuss their sustainable practices and monitor their achievements.

Against this background, I am delighted that we at FIVS have produced this document and launched it at this time, since the need to conduct our business responsibly and with an eye to future generations has never been clearer. In it, we present some of the activities and outputs of FIVS<sup>1</sup> over the last 15-20 years and show how we have been seeking to encourage environmental, social, and economic sustainability in the industry over that period. Although the whole structure and emphasis of our work is sustainability-oriented, it seemed appropriate at this time to present it through the lens of the UN SDGs to make the magnitude and scope of our commitment clearer and more accessible to a wider audience.

Accordingly, the timeline in Section 2 shows our work products in the area of sustainable development over the last 15+ years. Two significant observations should be made in the light of this information:

- All the outputs listed were approved unanimously by the members of FIVS (we work on the basis of complete consensus) – which demonstrates the high level of understanding at all levels of the organisation about the significance of promoting sustainable practices.
- There has been a steady stream of FIVS initiatives in all areas of sustainability over a period of more than 15 years. All of these are designed to encourage the industry towards greater activity in these areas, as well as to equip it in making those efforts.

Bearing in mind that the membership of FIVS encompasses approximately 75% of the wine traded globally, this amounts to a resounding commitment from the majority of wine producers around the world.

Section 4 shows the level of intersection between these efforts by FIVS and various elements within the UN SDGs. In addition, the Appendices in Section 5 contain some examples of the tools that are listed in the timeline. It should be clear that FIVS is committed to continue its efforts in this area for the foreseeable future, and to continuous improvement both in the federation and in the tools it produces for members and the wider industry. We are justly proud of what we have done to date, but we are not intending to slow down, or to rest on our laurels going forward!

Greg Hodson  
President



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<sup>1</sup>FIVS has been a global voice for the alcohol beverage industry since 1951. FIVS is a non-governmental, global organisation that fosters collaboration between its members from the wine (and to a lesser extent, beer and spirits) sectors to advocate on public policy matters of mutual interest, and in relation to which consensus positions are reached by its members. FIVS gathers and disseminates this information to international and intergovernmental organisations as well as governments. Our members include producers, distributors, importers, regulators, exporters, and trade associations. In 2019, FIVS members accounted for around 75% of the wine traded globally.



## 2. FIVS TIMELINE



## 2. FIVS Timeline

*Most of the work products mentioned in the timeline below are accessible in their full, current versions by clicking on the title.*

Year	Initiative
2004	FIVS adopts its first <b>Strategic Plan</b> which sets its direction and purpose for the future and acknowledges sustainable practices as a key success factor for the alcohol beverage industry. The vision of FIVS set forth in the strategic plan is: “A successful global beverage alcohol industry, operating on the principles of corporate social responsibility, sustainability, and focus on consumer interests, in an environment free from trade-distorting factors of all kinds”.
2006	FIVS members unanimously adopt the first edition of the <b>Global Wine Producers’ Environmental Sustainability Principles</b> which recognise that environmentally sustainable practices are an imperative for the wine industry. The document presents a unifying set of environmental sustainability principles and assists in their implementation, whilst recognising the need for flexibility to address regional variation.
2007	<b>FIVS-Assure</b> , an online database that gathers resources on social aspects programs in the wine, spirits, and beer sectors, is launched. The tool draws upon exemplary practices by companies, trade associations, and other entities from around the world and is made available to the general public on the FIVS website.
2008	<b>FIVS-Abridge</b> is created as an online database of international regulations and agreements for wine and spirits. The database consists of domestic regulations and relevant international agreements for markets around the world, covering topics such as certification, composition, labelling, and tariffs. Although the database is a subscription product, it is made available free of charge to government regulators in order to promote consistent, appropriate regulation for wine worldwide.
2011	FIVS publishes the <b>FIVS Guiding Principles for Advertising and Marketing</b> outlining the major principles that should be considered in producing codes of best practice for the advertising and marketing of alcohol beverages. These include representation of moderate and responsible consumption, no depiction of minors, and abstaining from linking consumption with therapeutic benefits or personal success.
2013	The <b>FIVS Regulatory Principles to Enhance Coherence and to Facilitate Trade in Wine</b> are unanimously endorsed by FIVS members. The 12 principles presented surround the establishment of regulatory limits for wine and verifying compliance with those limits by analytical methods. The overarching objective is to facilitate trade in wine and avoid obstacles to trade according to the rights and obligations of international accords. A <b>series of technical documents</b> produced by the FIVS Scientific and Technical Committee illustrate how practical application of the principles might occur.
2015	The FIVS Guiding Principles for Advertising and Marketing are updated with an <b>Annex on Digital Marketing</b> in response to the rapid growth and increased relevance of digital marketing and advertising. This includes ensuring that digital campaigns are not accessible to underage users and that user privacy is protected in digital marketing.

- 2015 **FIVS-APACE (FIVS Additives and Processing Aids Codex for Enology)** is launched with the ambition of being a comprehensive online information source for additives and processing aids that are approved for winemaking use around the world.
- 2016 The **Global Wine Producers' Environmental Sustainability Principles** are updated after 10 years of existence and made available in Spanish, Italian and French.
- 2016 A **second set of Regulatory Principles to Enhance Coherence and to Facilitate Trade in Wine** composed of nine new principles is endorsed by FIVS members.
- 2016 The **FIVS International Wine Greenhouse Gas Protocol** is released. Its purpose is to help winegrowers and vintners account for, improve, and communicate the corporate carbon emissions of their business by providing an industry standard; provide a consistent framework and ensure the Wine Greenhouse Gas Protocol aligns with current best practices; and integrate measures that ensure the longevity of the standard.
- 2016 The **FIVS Good Fining Practices: Guidelines for the fining of wine using proteinaceous agents with allergenic potential** are published on the FIVS website. The document sets out the regulatory background to the labelling requirements for use of food additives and processing aids that are, or contain potential food allergens. It outlines guidance on internationally agreed best fining practices for winemaking, together with the validation procedures, scientific and empirical data that have been used to demonstrate that these practices remove from the final product detectable residues of substances used as fining agents in winemaking.
- 2017 FIVS members adopt the **FIVS Social Sustainability Principles for Ethical Trading**. The principles set the foundation for actions undertaken by participants to incorporate social responsibility into the core of their business. This includes conducting business in respect of human rights and ensuring lawful, fair, and ethical behaviour in all commercial dealings. The pursuit of a constructive and open dialogue among business partners and stakeholders in order to reinforce the principles of socially responsible business is required as well as the establishment of mature relations along the supply chain to promote sustainable business practices.
- 2017 FIVS and the **University of Reims, Wine & Law Program – A Jean Monnet Chair**, partner to create the **Jean-Jacques Bouffard Scholarship**. The scholarship offers the opportunity for industry professionals to attend the annual Autumn School of Wine Law in the European Union organised by the University of Reims.
- 2017 FIVS members agree to align the structure of the federation according to the **“triple bottom line of sustainability”** (environmental, social, and economic) to reflect its long-standing commitment to promoting a sustainable alcohol beverage industry. It now conducts a large part of its work through three working groups, each dedicated to one element of the triple bottom line approach. These groups are assisted by a Scientific and Technical Committee, and a Codex Alimentarius Task Force.

- 2018 FIVS and **Wine in Moderation** (the international organisation in charge of coordinating the international implementation and growth of the Wine in Moderation Programme which seeks to emphasise responsible drinking and moderate wine consumption around the world) sign a Memorandum of Understanding. Both organisations agree to further the shared objective of increasing awareness of the significance of social responsibility in the alcohol beverage area.
- 2019 FIVS and the University of Reims also launch the **FIVS-Abridge Competition**, which is open to university students and is based on a case study that uses FIVS-Abridge, a database of international regulations and agreements for wine and spirits.
- 2019 FIVS signs a Memorandum of Understanding with **Oenoppia**, an international trade association of producers focusing on oenological products. Both parties pledge to build on their joint work to promote a successful and sustainable global alcohol beverage sector, as well as to share information and promote educational efforts. The **FIVS-Oenoppia Guidelines for Purchasing and Due Diligence — Identity, Quality & Food Safety of Oenological Products** are also published in a bid to help winemakers and suppliers to navigate more easily the complex process involved with the purchase and sale of oenological products.
- 2019 FIVS launches the first edition of the **FIVS International Sustainable Winegrowing Award**. Based on the three pillars of sustainability, the award honours wine organisations that take a leading role in implementing sustainable practices. Wineries must demonstrate, *inter alia*, consistency with FIVS's Global Wine Producers' Environmental Sustainability Principles, which promotes the idea that the continued health of the wine industry relies on natural resources that are successfully integrated with sound ecological processes.
- 2020 A new page dedicated to **COVID-19** is published on the FIVS website. The page, which is publicly available, offers practical resources, technical and sanitary measures, guidelines, and trends in response to the COVID-19 pandemic.



## **3. FIVS AND THE UN SDGS AT A GLANCE**



### 3. FIVS and the UN SDGs at a Glance

SDG	ENVIRONMENTAL SUSTAINABILITY	SOCIAL SUSTAINABILITY	ECONOMIC SUSTAINABILITY	SCIENTIFIC & TECHNICAL COMMITTEE	CODEX TASK FORCE
<b>3</b> GOOD HEALTH AND WELL-BEING 	✓	✓			✓
<b>4</b> QUALITY EDUCATION 	✓	✓	✓		✓
<b>5</b> GENDER EQUALITY 		✓			
<b>6</b> CLEAN WATER AND SANITATION 	✓	✓			
<b>7</b> AFFORDABLE AND CLEAN ENERGY 	✓				
<b>8</b> DECENT WORK AND ECONOMIC GROWTH 	✓	✓	✓	✓	
<b>9</b> INDUSTRY, INNOVATION AND INFRASTRUCTURE 				✓	✓
<b>10</b> REDUCED INEQUALITIES 		✓			
<b>12</b> RESPONSIBLE CONSUMPTION AND PRODUCTION 	✓	✓			
<b>13</b> CLIMATE ACTION 	✓				
<b>14</b> LIFE BELOW WATER 	✓				
<b>15</b> LIFE ON LAND 	✓				
<b>17</b> PARTNERSHIPS FOR THE GOALS 	✓	✓	✓	✓	✓



# 4. FIVE ACTIONS TO HELP ACHIEVE THE UN SDGS





## 4. FIVS's Actions to Help Achieve the UN SDGs

### SDG 3 Good Health and Well-Being



FIVS is actively engaged in the promotion of best practices on well-being and the responsible use of alcohol. In 2007, FIVS created FIVS-Assure which is a publicly available online database that gathers resources on social aspects programmes in the wine, spirits, and beer sectors. This tool draws upon exemplary practices by FIVS members, companies, trade associations, and other entities from around the world. A new version was launched in November 2020 with over 100 entries including an interactive map of national drinking guidelines around the world, featured initiatives, and an enhanced user interface.

In 2018, FIVS partnered with the organisation Wine in Moderation with the shared objective of increasing awareness of the significance of social responsibility in the alcohol beverage area.

### SDG 4 Quality Education



FIVS supports the acquisition of skills and knowledge to promote sustainable development via multiple channels. It circulates weekly news bulletins focused on economic, environmental, and social sustainability, and organises twice-yearly conferences centred on the sustainable development of the global alcohol industry. FIVS maintains a publicly available webpage collating practical resources, guidelines, and trends in response to the COVID-19 pandemic.

FIVS created the Jean-Jacques Bouffard scholarship in 2017 which gives a young professional the opportunity to attend a course on international wine law at the University of Reims every year. The scholar is awarded a French university diploma upon completion of the course. FIVS also holds the annual FIVS-Abridge Competition: it is an academic competition for master's level students based on a case study that uses FIVS-Abridge, a database of international regulations and agreements for wine and spirits.

Finally, many of FIVS's principles and activities promote quality education with a primary focus towards our members and regulators of our products:

- the **Global Wine Producers' Environmental Sustainability Principles** promote awareness through education in order to further "sustainability objectives and build awareness within the global wine sector" (see Appendix I).
- the **FIVS Guiding Principles for Advertising and Marketing** encourage businesses to "conduct activity or materials that educate the public, including underage persons, about the consequences of alcohol consumption and the possible consequences of excessive or underage consumption" (see Appendix II). FIVS members reported convergence between their national advertising codes and the FIVS principles.
- the **FIVS International Sustainable Winegrowing Award** rewards companies that actively integrate and train their workforce, and that support research and education to enhance their community's environment.

- The **FIVS Social Sustainability Principles for Ethical Trading** provide guidance on how to incorporate social responsibility into the core of businesses (see Appendix IV).
- **FIVS-Assure**, FIVS's social responsibility database, makes available programmes and codes of conduct which encourage education for sustainable lifestyles.
- FIVS and **Wine in Moderation** partnered in 2018 to encourage the adoption of responsible consumption programmes, support vocational training and promote sustainable lifestyles around the world.

## SDG 5 Gender Equality



FIVS supports gender equality in working environments and advocates for it via the FIVS Social Sustainability Principles for Ethical Trading: "Participants and business partners shall not discriminate, exclude or have a certain preference for persons on the basis of gender (...)" (see Appendix IV). It is also making progress in this regard in its own structures regarding participation and leadership. Over the past seven years, FIVS has made good progress in increasing the representation of women in leadership roles at all levels of the organisation, including working groups, Presidential Council and Secretariat.

## SDG 6 Clean Water and Sanitation



Water is paramount for the wine industry and has been a centre of preoccupation at FIVS for many years due to more frequent droughts and water scarcity. Unpredictable access to water has become a common issue for the wine industry in many parts of the world, leading vintners to introduce new drought-mitigation strategies to reduce their water usage. The FIVS Global Wine Producers' Environmental Sustainability Principles (see Appendix I) have been promoting water use efficiency and reuse for more than 15 years by encouraging wineries to perform environmental risk assessments for water use efficiency and wastewater management and through the implementation of environmentally sustainable activities. Water management is also a central criterion for the FIVS International Sustainable Winegrowing Award.

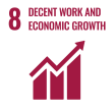
Furthermore, the FIVS Social Sustainability Principles for Ethical Trading encourage access to safe drinking water, safe and clean eating and resting areas in working environments, as well as healthy working and living conditions for workers and local communities and responses to potential threats to these (see Appendix IV).

## SDG 7 Affordable and Clean Energy



FIVS encourages businesses to use renewable and clean energy through the FIVS Global Wine Producers' Environmental Sustainability Principles, which recommend performing environmental risk assessments for energy use, carbon accounting, transportation, and fossil fuels, amongst others. Risk assessment is coupled with the implementation of environmental sustainability activities, evaluation, and continuous improvement for greater efficiency (see Appendix I). The FIVS International Sustainable Winegrowing Award also rewards vineyards with strong agricultural and winemaking protocols for energy savings.

## SDG 8 Decent Work and Economic Growth



FIVS encourages sustainable production across the board, enhancing economic performance, including job creation, innovation, and creativity. FIVS works to remove trade barriers around the world and to facilitate global trade via the promotion of the harmonization and/or mutual acceptance of regulations in areas such as beverage production methods and labelling, and through its Regulatory Principles to Enhance Coherence and to Facilitate Trade in Wine (see Appendix III). The Regulatory Principles are supported by technical papers produced by FIVS's Scientific and Technical Committee, which are publicly available on the FIVS website.

FIVS also encourages the evaluation and adoption of appropriate new technologies and promotes the protection of private Intellectual Property rights in the global marketplace, e.g. from counterfeiting and other fraud. The wine industry is a value-added sector comprising mostly micro-, small- and medium-sized enterprises and has a demonstrated economic multiplier effect on other segments of the economy, such as hospitality and tourism. Studies on the contribution of the alcohol beverage industry to various economies such as the United States, the European Union, and Canada are regularly conducted by FIVS members and collated on the FIVS website for further dissemination.

In addition, FIVS encourages fair employment policies, such as fair remuneration and compliance with wage legislation or industry standards, as well as robust mechanisms to be established against child and bonded labour via the FIVS Social Sustainability Principles for Ethical Trading which were unanimously adopted by FIVS members in 2017 (see Appendix IV).

## SDG 9 Industry, Innovation and Infrastructure



FIVS has developed two sets of Principles to Enhance Regulatory Coherence and to Facilitate Trade in Wine and has developed supporting technical papers to help promote appropriate regulation of wine in the light of its unique product characteristics (see Appendix III). Many of the principles and papers have been presented to the International Organisation of Vine and Wine (OIV), the World Wine Trade Group, the Asia Pacific Economic Cooperation (APEC) economies via the APEC Wine Regulatory Forum and to other national governments by means of the International Wine Technical Summit (IWTS). FIVS's online database of international regulations and agreements for wine and spirits, FIVS-Abridge, is supplied free of charge to governments of these economies to facilitate the development of more harmonized approaches to regulation. This is also the case with FIVS-APACE, which was designed by FIVS as a comprehensive online information source for additives and processing aids that are approved for winemaking use around the world. FIVS members also reported using the FIVS Good Fining Practices: Guidelines for the fining of wine using proteinaceous agents with allergenic potential, to respond to allergen labelling requirements around the world.

In addition, FIVS is working on the development of technical guidelines and tools in relation to developing issues. This includes innovative approaches to nutritional and ingredient labelling and the development of digital and e-commerce strategies based on new technologies such as distributed ledger technology.

## SDG 10 Reduced Inequalities



FIVS's Social Sustainability Principles for Ethical Trading (FSSPET) set the foundation for actions undertaken by participants to incorporate social responsibility into the core of their business. This includes promoting social inclusion for all regardless of any status or condition that could give rise to discrimination and prohibiting unethical behaviour such as bonded or child labour. FSSPET participants are expected to “conduct their businesses, within their sphere of influence, to respect human rights and ensure lawful, fair and ethical behaviour in all their commercial dealings [...] and pursue an open dialogue among business partners and stakeholders in order to reinforce the principles of socially responsible business” (see Appendix IV).

This set of principles and values reflects the beliefs of FIVS wine sector participants.

## SDG 12 Responsible Consumption and Production



In its quest to advance the triple bottom line of sustainability, FIVS encourages waste reduction, as well as recycling and reuse, also known as the three Rs of waste management. The FIVS Global Wine Producers' Environmental Sustainability Principles highlight the importance of conducting risk assessments for various by-products including wastewater and solid wastes. In addition, the Principles stress the need to perform “self-assessments” and other forms of evaluation or reporting in order to drive continuous improvement (see Appendix I). In parallel, participants and business partners of the FIVS Social Sustainability Principles for Ethical Trading are expected to keep accurate information regarding their activities, structure, and performance, and to disclose these in accordance with applicable regulations and industry benchmark practices (see Appendix IV).

The FIVS International Sustainable Winegrowing Award also rewards businesses that have packaging protocols for waste reduction, innovative approaches to management and valorisation of by-products, close the loop programmes, and show leadership in communication of sustainable best practices.

## SDG 13 Climate Action



Climate change is a prominent issue for members of the alcohol beverage industry as they are currently grappling with its impacts around the world. FIVS has been supporting work in this area for many years: in 2007 FIVS members produced the first International Wine Carbon Calculator and made it available within FIVS to help wineries assess and improve their carbon footprint. An updated Greenhouse Gas Accounting Protocol was adopted by FIVS in 2016 to support a consistent quantification approach across the international wine industry when corporate carbon footprinting activities are undertaken.

The FIVS Global Wine Producers' Environmental Sustainability Principles also provide a framework for a coordinated, efficient, and results-driven approach to environmental sustainability and mitigation of climate change. Businesses are encouraged to integrate climate change mitigation measures into their strategies and planning by performing environmental risk assessments for carbon accounting, biodiversity, transportation, and fossil fuels. Industry members are also expected to partner with stakeholders and participate in sector-wide sustainability programmes in order to successfully address the transnational nature of climate change (see

Appendix I). Finally, the FIVS International Sustainable Winegrowing Award takes into account wineries' efforts to reduce carbon emissions in its sustainability evaluation.

### SDG 14 Life Below Water



FIVS encourages the implementation of adequate measures to prevent or minimise all environmental degradation, and in particular water ecosystems, through the FIVS Social Sustainability Principles for Ethical Trading: "Participants and business partners should assess significant environmental impact of operations, and establish effective policies and procedures that reflect their environmental responsibility. They will seek to implement adequate measures to prevent or minimise adverse effects on the community, natural resources and the overall environment" (see Appendix IV). The same is expected from those who subscribe to the Global Wine Producers' Environmental Sustainability Principles on the basis of environmental risk assessments for water use efficiency and wastewater management (see Appendix IV). The FIVS International Sustainable Winegrowing Award also considers efforts regarding biodiversity in all its forms in order to measure wineries' commitment to sustainability.

### SDG 15 Life on Land



As far back as 2006, the FIVS Global Wine Producers' Environmental Sustainability Principles (GWPESP) recognised that the wine industry is entirely dependent on natural resources, solar energy, suitable climate, clean water, and healthy soils, and must successfully integrate these elements in an ecologically sound manner. The protection and the enhancement of these natural assets through sustainable practices is imperative. The GWPESP offer strategies to guide those in the industry in implementing sustainability principles. This includes performing environmental risk assessments for soil condition, biodiversity, neighbouring land area, and agrochemical use to ensure the preservation of terrestrial ecosystems (see Appendix IV).

The FIVS Social Sustainability Principles for Ethical Trading also encourage participants and businesses to protect the environment by conducting risk assessments to prevent or minimise adverse effects of operations (see Appendix IV).

The FIVS International Sustainable Winegrowing Award promotes sustainable land ecosystems by evaluating participants based on their approach to, *inter alia*, soil conservation, pest management, seed/variety selection, preservation, and diversity.

### SDG 17 Partnerships for the Goals



As an international trade federation, FIVS is committed to multilateral collaboration and building partnerships between the public and private sectors. FIVS and its members adhere to a universal, rules-based, open, non-discriminatory, and equitable multilateral trading system under the World Trade Organization.

FIVS is an active observer at Codex Alimentarius, the World Intellectual Property Organization, and the International Organisation of Vine and Wine. FIVS also actively collaborates with the Asia Pacific Economic Cooperation's Wine Regulatory Forum, the International Wine Technical Summit and the World Wine Trade Group and produces

a wide variety of papers to promote appropriate and harmonised wine regulation around the world.

Building partnerships is also central to FIVS's values as stated in the FIVS Global Wine Producers' Environmental Sustainability Principles (*Partnering with Stakeholders, and Participation in Sector-Wide Sustainability Programmes*). FIVS partners with organisations which share its vision of a successful global alcohol beverage industry, operating on the principles of economic, social, and environmental sustainability. FIVS has established memoranda of understanding with Oenoppia and Wine in Moderation, and works closely in partnership with the University of Reims on academic programmes in wine law.





## 5. APPENDICES



## 5. Appendices

- Appendix I Global Wine Producers' Environmental Sustainability Principles
- Appendix II FIVS Guiding Principles for Advertising and Marketing - with Annex on Digital Marketing
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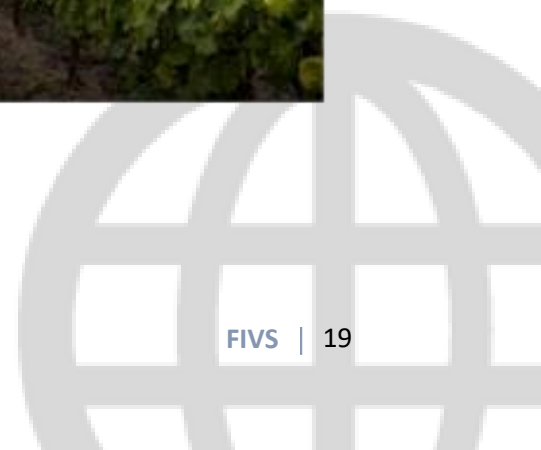
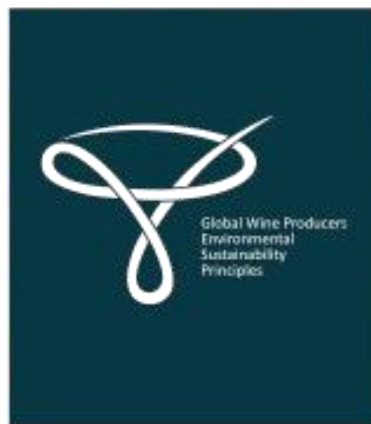




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## GLOBAL WINE PRODUCERS ENVIRONMENTAL SUSTAINABILITY PRINCIPLES

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## VISION

The Global Wine Producers Environmental Sustainability Principles (GWPESP) provide a framework to promote a coordinated, efficient and results-driven approach for the international wine industry's environmental sustainability efforts. It offers strategies to guide those in the industry in integrating sustainability principles.

Developed by FIVS, the GWPESP initiative recognises that the wine industry is entirely dependent on natural resources, solar energy, suitable climate, clean water, healthy soils, and must successfully integrate these elements in an ecologically sound manner. The protection and the enhancement of these natural assets through sustainable practices are an imperative.

## STRATEGIES

The Global Wine Producers Environmental Sustainability Principles (GWPESP) aims to achieve the following outcomes:

- Offer a unifying set of environmental sustainability principles for adoption by FIVS members.
- Assist FIVS members in applying environmental sustainability principles through programmes considered appropriate by individual FIVS members.
- Recognise the need for flexibility to enable FIVS members to give priority to addressing significant environmental issues in their winery/vineyard locations and to allocate resources according to those priorities.
- Demonstrate FIVS' commitment and that of its members in fostering a sound environment and in enriching the communities in which they operate.

## ENVIRONMENTAL SUSTAINABILITY PRINCIPLES

Under the Global Wine Producers Environmental Sustainability Principles (GWPESP), the international wine industry supports the following principles:

### PARTICIPATION IN SECTOR-WIDE SUSTAINABILITY PROGRAMMES

The selection of appropriate environmental sustainability programmes is based on their ability to satisfy the triple bottom line of economic, environmental and social sustainability. Understandably, the triple bottom line threshold varies among individual enterprises, which must be flexible in establishing programmes that promote sustainability aims within individual operating environments.

### IMPLEMENTATION OF ENVIRONMENTAL SUSTAINABILITY ACTIVITIES

A process should be introduced to plan for and implement environmental sustainability activities, assess their effectiveness and make corrections to drive continuous improvements.

### EVALUATION AND CONTINUOUS IMPROVEMENT

Wine sector environmental sustainability programmes should incorporate "self-assessments" and other forms of evaluations of environmental performance.

### PROMOTING AWARENESS THROUGH EDUCATION

Integrating educational opportunities promote sustainability objectives and build awareness within the global wine sector.

### PARTNERING WITH STAKEHOLDERS

Global wine producers should consider partnerships with both wine industry and natural resource management stakeholders to improve sector sustainability, including the adoption of preferential purchasing policies from suppliers able to demonstrate a similar stewardship ethic.

## PERFORMING ENVIRONMENTAL RISK ASSESSMENTS

The identification of environmental sustainability activities is based on environmental risk assessments. Priority is given to significant and unique risks in individual geographical regions where wineries and vineyards are located. Environmental risk assessments cover but are not limited to the following:

- Site selection (for new vineyards/wineries)
- Variety selection (for new vineyards)
- Soil condition
- Water use efficiency
- Wastewater
- Carbon accounting
- Transportation and fossil fuels
- Biodiversity
- Solid waste
- Energy use
- Air quality
- Neighbouring land area
- Agrochemical use
- Human resource management

The global wine sector has a long-standing record of proactively implementing environmental sustainability programmes. With the heightened expectations and increased scrutiny by governmental regulators, customers and consumers, the GWPESP enhances a framework for responsible environmental stewardship programmes that have been or are being developed by FIVS members. Wine sector programmes need to be based on the GWPESP while retaining their ability to operate within countries' unique regulatory social, natural resource and biophysical conditions.



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## THE GWPESP RECOGNISES THAT ROBUST ENVIRONMENTAL CREDENTIALS ARE ESSENTIAL TO THE INDUSTRY'S SURVIVAL AND SUCCESS.

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### ENVIRONMENTAL SUSTAINABILITY PROGRAMMES

Several wine producing countries have sector-wide environmental stewardship programmes in place. These include:

- [Integrated Production of Wine](#), South Africa
- [California Sustainable Winegrowing Programme](#), USA
- [Sustainable Winegrowing New Zealand](#), New Zealand
- [Entwine Australia](#), Australia
- [Sustainability Code of the Chilean Wine Industry](#), Chile

These programmes, which either cover or will eventually address both vineyard and winery operations, suggest a widespread awareness of environmental sustainability aims and a commitment to their viability. Typically, each scheme is administered by a single organisation that is able to allocate the necessary resources to ensure effective implementation.

These programmes are flexible enough to be based on clear principles that address overarching environmental sustainability objectives, while preserving the ability to achieve success within their particular operating environment.

These programmes recognise the importance of being open to change. This means they are responsive to industry, regulator and market feedback to incorporate novel practical solutions to meet shifting environmental sustainability aims.

Scrutiny is integrated by means of self-assessments, with some programmes also incorporating independent auditing.

Training and communication play important roles in each scheme and are fundamental to achieving continuous improvements in the environmental sustainability area.

To view a more detailed treatment of programmes, visit the FIVS website: [www.fivs.org](http://www.fivs.org).

### BACKGROUND

The GWPESP is a project of FIVS, a not-for-profit trade association serving all sectors of the alcohol beverage industry, including producers, distributors, importers, exporters, and national associations from around the world.

A challenge existed in aligning environmentally sustainable objectives with the needs of the global wine industry. The number and varied nature of environmental strategies throughout the world reinforced the need for recognising the special character of the wine sector's geographically diverse production regions.

FIVS formulated the GWPESP by taking into account concepts in the Consumer Goods Forum's Global Food Safety Initiative as well as in the International Organisation of Vine and Wine's (OIV) Guidelines for Sustainable Vitiviniculture.

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# FIVS GUIDING PRINCIPLES FOR ADVERTISING AND MARKETING PRACTICES FOR ALCOHOL BEVERAGES

## Background

FIVS is a world-wide organisation designed to serve all sectors of the alcohol beverage industries. It includes producers, distributors, importers, exporters, and trade associations, and it interfaces with many international organisations. FIVS was founded in July 1951, and has its headquarters in Paris, France.

In 2004, the members of FIVS adopted a strategic plan (since revised on several occasions) for the organisation which sets its vision for the future as follows:

*A successful global beverage alcohol industry, operating on the principles of corporate social responsibility, sustainability, and focus on consumer interests, in an environment free from trade-distorting factors of all kinds.*

In keeping with its vision, FIVS has developed a set of guiding principles for the advertising and marketing of alcohol beverages. Many codes have appeared over recent years and in different countries to provide guidance in this area. Some have been produced by individual companies, some by trade associations, and some by other groups.

It is desirable to have the greatest degree of coherence possible between these codes, while acknowledging that national and cultural norms, together with differing national regulatory frameworks, require variances in some areas. In order to promote this goal, FIVS decided to produce a document outlining the major principles that should be considered in producing codes of practice for the advertising and marketing of alcohol beverages.

The alcohol beverage industry can contribute significantly to the promotion of responsible consumption of alcohol by adhering to codes based on the principles outlined in this document. Accordingly, it is hoped that this document will provide a reference for the revision of existing codes and the development of new ones.

## Introduction

The advertising and marketing of any product should be done responsibly. It is helpful to identify fundamental principles that should guide such activities. The principles in this document are aimed at providing guidance to encourage advertising and marketing that promotes responsible consumption of

alcohol beverages. Of course, those who enjoy alcohol beverages have a responsibility also to consume in a responsible manner.

The following general principles have been identified as fundamental in this area. In some cases, examples are given of how the principles are applied in differing national and/or cultural situations:

### **1. Consumption should only be represented at an appropriate age.**

#### **Explanation of the principle:**

The inappropriate consumption of alcohol beverages by minors is of increasing concern around the world. Advertising and marketing that has a particular appeal to children or adolescents can lead to improper use. To this end, advertisements that feature consumption only by individuals who are older than the national legal drinking age help promote responsible consumption of alcohol beverages.

#### **Examples of the scope of the principle and its application in codes of best practice:**

Consideration should be given to including provisions such as the following in codes of best practice:

- Adults appearing in advertisements should be of legal drinking age AND appear to be four or five years of age above the national legal drinking age.
- No brand identification of alcohol beverages (logos, trademarks, etc.) should be used on items intended for use by minors, such as children's clothing and toys.
- Advertisements should not promote alcohol beverage use for events directed primarily towards children or in which children form a sizeable percentage of the audience.
- Advertisements should only be placed in media where the clear majority of the viewers are expected to be adults of legal drinking age.
- Alcohol beverages shall not be suggested to be similar to another beverage/product that is primarily popular with those below legal drinking age.

#### **Discussion of the application of this principle in different countries and/or cultures:**

Although there is universal consensus that alcohol beverages should not be marketed to underage persons, specific criteria regarding responsible placement of advertisements will vary from country to country.

By way of example, existing national codes contain stipulations such as the following in respect of advertising and marketing materials:

- They should not contain either the name or images of Santa Claus.
- They should not be located outdoors in the vicinity (500 feet) of an elementary/secondary school, except on a licensed premise.

- They should not appear in college/university newspapers, or on college campuses except for licensed establishments on such campuses.
  - They should not feature individuals considered “heroes” of the underage.
  - Promotional websites should require confirmation that those who use them are over the legal purchase age for alcohol beverages in their country of access.
- Please see the *FIVS Digital Marketing Annex* for a more detailed treatment of this principle.

## 2. Only responsible and moderate consumption should be represented.

### Explanation of the principle:

A small minority of drinkers engage in illegal or even reckless drinking practices. Advertisements and marketing initiatives should never encourage or make light of such behaviour. Advertisements and marketing initiatives are most constructive when they feature alcohol consumption in a safe and appropriate manner and setting.

### Examples of the scope of the principle and its application in codes of best practice:

Consideration should be given to including provisions such as the following in codes of best practice:

- Advertisements and marketing initiatives should not portray excessive consumption or the abuse of alcohol.
- Advertisements and marketing initiatives should not depict the consumption of alcohol beverages in association with illegal, violent, or aggressive behaviour.
- Advertisements and marketing initiatives should not depict the consumption of alcohol beverages in association with illegal drugs.
- Advertisements and marketing initiatives should not depict any direct association between the consumption of alcohol beverages, and the operation of a motor vehicle, boat or aircraft or engagement in any sport (including swimming and water sports) or any potentially hazardous activity.
- Consumption of alcohol beverages in connection with the above activities should not be represented as taking place before or during engagement in the activity in question and should portray safe practices.
- Advertisements and marketing initiatives should not challenge or dare people to drink or sample a particular alcohol beverage and should not contain any inducement to prefer an alcohol beverage because of its alcohol content.
- Advertisements and marketing initiatives should not present abstinence or moderation in a negative way.

- Advertisements and marketing initiatives should not depict binge drinking as a normal and acceptable form of behaviour.
- Advertisements and marketing initiatives should avoid point of sale promotions that do not comply with applicable codes of national practice or are inconsistent with responsible promotional practices.
- Advertisements and marketing initiatives should not depict the consumption of alcohol beverages for the effects their alcohol content may produce.
- Advertisements and marketing initiatives should not feature persons who appear to be drunk or out of control.
- Advertisements and marketing initiatives should not convey the implication that excessive drinking or loss of control is amusing.
- Advertising should not be directed towards pregnant women.

### **3. Consumption should not be represented as linked with therapeutic benefits or personal success.**

#### **Explanation of the principle:**

A substantial body of scientific data strongly suggests beneficial health effects of moderate consumption of alcohol beverages. However, excessive consumption may result in adverse health and social consequences. Accordingly, advertisements should not link alcohol consumption with therapeutic benefits or to personal, business, social, sporting, sexual or other success.

#### **Examples of the scope of the principle and its application in codes of best practice:**

Consideration should be given to including provisions such as the following in codes of best practice:

- Advertisements and marketing initiatives should not suggest that the consumption of alcohol beverages offers any therapeutic benefit or is an aid to relaxation.
- Advertisements and marketing initiatives should not imply that consumption will prevent or cure any illnesses or diseases.
- Advertisements and marketing initiatives should not depict the consumption or presence of alcohol beverages as a cause of or as contributing to the achievement of personal, business, social, sporting, sexual or other success.
- Advertisements shall not portray alcohol consumption as a rite of passage to adulthood.
- Advertisements and marketing initiatives should not suggest that alcohol consumption enhances mental ability or physical performance.
- If alcohol beverages are depicted as part of a celebration, advertisements and marketing initiatives should not imply or suggest that the beverage was a cause of or contributed to success or



achievement.

- All advertisements should be in good taste and shall not denigrate the human form, or people based on gender, religion or protected class.

#### **4. Consistency with these principles should be ensured by a vetting system.**

##### **Explanation of the principle:**

Self-regulatory mechanisms for advertisements and promotional materials have led to a substantial reduction in inappropriate alcohol advertisements. One effective element of a self-regulatory approach is the establishment of a system by which materials can be reviewed against codes of best practice and other principles and found to be in compliance with them before use.

##### **Examples of the scope of the principle and its application in codes of best practice:**

- Codes of best practice for advertising and marketing of alcohol beverages should contain a self-regulatory review system for advertisements and possibly other marketing materials.
- The system should use independent adjudicators to evaluate advertisements and determine if they are in accordance with national codes of best practice.
- There should be an established system for addressing advertisements that do not meet the standards expressed in this document or in relevant codes.

#### **5. Further Considerations**

These guiding principles should also be considered when developing codes of best practice for other aspects of alcohol beverage advertising and promotion.

##### **Promotion of alcohol beverages at events**

Alcohol beverage companies and associations play a valuable role in supporting many community events and activities. They are normally able to promote their products at events together with the right to promote their association with the events and event participation.

There are responsibilities that accompany these promotions. It is strongly recommended that codes of best practice include provisions urging alcohol beverage companies to ensure that:

- They do not promote their products at events that are clearly designed to target people under the legal drinking age.
- All promotional advertising in support of events and all promotional materials distributed at them are fully consistent with national codes of best practice based on principles such as those presented in this document.

- Alcohol beverages are served at events in a way that is consistent with national codes of best practice based on principles such as those presented in this document, and where applicable with legal requirements, for responsible serving of alcohol.
- A condition for participation in giveaways promoted by alcohol companies at or in association with events is that participants must be over the legal drinking age.
- Prizes given away in promotions associated with alcohol beverage companies are awarded only to winners who are over the national legal drinking age.
- Promotional staff at events are over the national legal drinking age. At many events, these promotional commitments are limited to specified activities. In general, national codes of best practice based on principles such as those presented in this document will only apply to such conduct, activities or materials associated with events that are also associated with alcohol beverage companies. Codes of best practice should recommend the use of every reasonable endeavour to ensure that where other parties control and/or undertake events, including activities surrounding those events, they are consistent with national codes of best practice based on principles such as those presented in this document.

### **Public Education**

Codes of best practice based on guiding principles such as those presented in this document should not discourage alcohol beverage companies and associations from being associated with conduct, activity or materials that educate the public, including underage persons, about the consequences of alcohol consumption and the possible consequences of excessive or underage consumption.

### **For more information**

If you are interested in viewing existing codes for advertising and marketing of alcohol beverages, several examples are posted on the WHO Committee Page in the “Marketing Codes for Beverage Alcohol” section.

*- July 2011 (Updated December 2015) -*



## FIVS Digital Marketing Annex

FIVS has developed an Annex covering Digital Marketing Issues related to the Guiding Principles for Advertising and Marketing Practices for Alcohol Beverages in response to the rapid growth and increased relevance of digital marketing and advertising. This Annex outlines industry standards for marketing and advertising via digital platforms and seeks to ensure that the FIVS Guiding Principles are applied effectively within emerging digital platforms.

The following are key social media terms (e.g., forums, features and content) relevant to the alcohol beverage trade.

- **Affirmation Tool:** A process that affirms the user is of legal purchasing age.
- **Digital Platforms:** Interactive forms of advertising including but not limited to: social networks (e.g., Facebook, LinkedIn), video sharing (e.g., Vine, YouTube), blogs, microblogs (e.g., Twitter, Tumblr), apps and websites.
- **Forwardable Content:** Content that can be shared, emailed, or sent to other users.
- **“Remember Me” Tool:** A button that allows users to save their login information for a particular digital platform on their computer.
- **User-Generated Content:** Content created or posted by consumers on a digital platform.

### 1. Users under the legal purchasing age should be prevented from accessing alcohol-related digital advertisements.

#### Explanation of the principle:

Underage users have greater access to alcohol-related digital advertisements than ever before. It has become necessary for industry members to take additional steps to ensure that their digital campaigns are not accessible to underage users.

#### Examples of the scope of the principle and its application in codes of best practice:

Consideration should be given to including provisions such as the following in codes of best practice:

- Digital marketing and advertising campaigns should feature an *age affirmation tool* upon entry to confirm that only persons of legal purchasing age are accessing their information.
  - Visitors may be invited to set-up a “Remember me” option to facilitate easier access to the site in the future, but:
    - This invitation should be accompanied by a reminder to the visitor to consider the appropriateness of this option if the computer is shared with youth who are not at an age where they can legally purchase the product.

- Direct electronic communications may contain a link allowing direct entry to the site (i.e. by-passing any age affirmation requests) for registered members who have already affirmed that they are over 18 years of age.
- If information provided on the digital platform can be *forwarded*, a warning should be included pertaining to the risks of sharing information with underage persons.
- In cases of unidirectional communication, i.e. solely from the producer to the consumer, industry members should not directly communicate with users within a space that has *greater than 30% members under the legal purchasing age*. Digital platforms should adopt regular demographic surveys of user ages to ensure they are not attracting underage youth.
- Industry members should post clear guidelines for *user-generated content* on their digital platforms, regularly review it for compliance, and deal with violations appropriately (e.g., user suspension, account deletion, etc.).

## 2. User privacy should be protected in digital marketing campaigns.

### Explanation of the principle:

Digital marketing and advertising campaigns provide ample opportunities for industry members to collect personal information on users of their digital platforms. As a result of this information collection, industry members should take necessary steps to ensure the privacy of their users' personal information.

### Examples of the scope of the principle and its application in codes of best practice:

Consideration should be given to including provisions such as the following in codes of best practice:

- Digital platforms should feature an age affirmation tool before the collection of any information, and should only collect information from those who have indicated that they are above legal purchasing age.
- Digital campaigns should offer the option to “opt in” or “opt out” of receiving direct digital marketing communications.
- Digital platforms should include details about how personal data will be collected and used. Under no circumstances should the information collected be sold or shared with third parties.
- Industry members should take appropriate measures to keep user information secure and protected from loss or theft.
- Data collection must be conducted in accordance with all applicable laws.

### Sources:

- [Alcohol and Tobacco Tax and Trade Bureau - Use of Social Media in the Advertising of Alcohol Beverages](#)
- [Diageo - Digital Code & Guidelines Summary](#)
- [European Advertising Standards Alliance - Digital Marketing Communications](#)
- [European Commission - Regulations of Alcohol Marketing in 24 European Countries](#)
- [Facebook Advertising Policies](#)

- [- spiritsEUROPE - Guidelines for the Development of Responsible Marketing Communications](#)
- [- The Alcohol Beverages Advertising \(and Packaging\) Code - Best Practice for the Responsible Marketing of Alcohol Beverages in Digital Marketing](#)
- [- Wine Institute - Guidance Note on Digital Marketing Communications](#)

- December 2015 -





# Regulatory Principles to Enhance Coherence and to Facilitate Trade in Wine

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## 1. Executive Summary

This paper presents several principles surrounding the establishment of regulatory limits for wine and verifying compliance with those limits by analytical methods. In particular, the following principles are presented:

- Avoid establish limits that stimulate costly and unnecessary analyses.
- Harmonize limits where there is no scientific justification for national or regional differences.
- Give due regard to intergovernmental agreements and work done by other authorities when establishing new regulatory limits.
- Adopt a common system of scientific units for expressing regulatory limits.
- Express regulatory limits on a “per unit volume of wine” basis rather than “per unit volume of alcohol” in the wine.
- Adopt a common way of expressing results where this is done in relation to a single wine constituent (e.g. for Total Acidity expressed in terms of one specific acid).
- Consider the establishment of analytical “de minimis” values for substances or classes of substances in wine - values below which they will be deemed to all intents and purposes not to be present in the wine.
- Allow suitable transition arrangements when limits are tightened, provided public health considerations so permit, and exempt wine from the requirement to be labelled with an expiration date.
- Analyses of wine for compliance purposes should be undertaken by suitably accredited laboratories (or overseen by certified analysts) that perform acceptably for the specific test methods used.
- Analytical methods used for wine compliance purposes should be validated and/or have a demonstrably appropriate level of performance for wine.
- For wine authenticity analyses, the database of authentic samples with which the test samples will be compared must be sufficiently comprehensive to avoid the mis-categorization of legitimate samples as fraudulent.
- Laboratories testing for compliance purposes should supply measurement uncertainty information with their analytical results and the competent authorities should take this into account in interpreting analytical data.

It is proposed that these principles might form the basis for an understanding among the appropriate countries, that would have a significantly trade-facilitating effect.



## 2. Introduction

The facilitation of trade in wine and avoidance of obstacles to trade according to the rights and obligations of international accords have always been central tenets by which the work of key international bodies dealing with wine has been conducted:

It is the purpose of this paper to propose an area of activity by such bodies to facilitate trade in wine and to avoid the creation of unnecessary obstacles to that trade. This is the area of the establishment of regulatory limits for wine, and the application of laboratory testing to verify compliance with those limits.

It is clear that regulatory limits are necessary in certain cases to be able to maintain product safety and composition standards, together with a level playing field for wines to compete in the global market. Limits and methods are good in their proper place and achieve useful purposes in international trade. Nevertheless, there have been times historically when a less positive and constructive role has been assumed by limits and by laboratory testing. In addition, many national regulatory limits were established in days before the wine market became the global entity that it is today. For these reasons, there are steps that can and should be taken to facilitate trade in wine in the 21<sup>st</sup> century that will have no impact whatsoever on the protections afforded to consumers on the one hand and honest traders on the other.

This paper outlines several principles that, if implemented by the appropriate governments around the world, would have an enormous positive impact on trade facilitation. They would work to reduce confusion and unnecessary costs, as well as to enhance the confidence that all sectors could enjoy in the robustness of laboratory testing results.

For each principle, explanatory background information is supplied. The principles are presented first for the establishment of regulatory limits and then for the laboratory testing that is done to determine compliance with those limits.

While the thrust of this current initiative and the principles described below focus on “wine,” the principles could equally be extended to cover “wine based products.” This extension would take into account in a similar manner the regulatory disparity that exists among different markets in the classification of this category of products.

## 3. Establishment of regulatory limits

### 3.1. Establish only necessary regulatory limits

The establishment of limits for constituents and potential contaminants in wine is certainly necessary in many cases to provide governments with a degree of comfort surrounding the quality and safety of wines in international trade. However, it is also true that once a regulatory limit has been established, it is often included either in certificates of analysis requirements of importing countries, or in the private standard documentation that may be necessary to sell product in a given market.

Every analytical test performed on a wine has cost implications for the producer and the multiplication of unnecessary tests can serve to increase the cost of doing business in a given market, eroding margins to a point where it is no longer feasible to trade. Examples of limits that might generally be considered unnecessary include:

- Establishment of pesticide MRLs for wine when they are already established and effectively controlled at the level of the raw material, grapes.
- Setting specifications for pathogenic microorganisms for wine, which does not support the growth of pathogenic microorganisms. We know from the text books that the results of a determination for salmonella in wine will always be that it is not present. To perform a test to demonstrate what is already known is costly and wasteful.
- Setting a limit at a level much higher than quantities ever seen in wines around the world. The establishment of the limit means that costly confirmatory analyses will be performed, but no products will actually fail to comply.
- The establishment of limits for wine that do not give sufficient regard to the low food safety risk status of wine, and may be more demanding than similar, pre-existing limits for foods with a similar risk profile to that of wine

**Principle:** Governments are respectfully recommended to avoid setting limits that stimulate costly and unnecessary analyses.

### 3.2. Harmonize regulatory limits where possible

The limits established for many components in wine relate to elements of composition and have no public health significance. In a global market, trading in wine can become very difficult when each market has different limits for the same component. Frequently, there is no scientific justification for the differences in limits observed between markets. As an example, see Appendix I, which (only by way of illustration) presents the limits around the world for methanol in wine. These levels are comparable to what one would find in freshly squeezed fruit juices, and are set for technological rather than toxicological reasons. It is instructive to see how many numerically different limits there are for just this one component.

Wine trade would be greatly facilitated if such limits, where they are necessary, could all be set at the same level in the different markets around the world.

**Principle:** Governments are respectfully requested to harmonize limits where there is no scientific justification for national or regional differences

### 3.3. Take due account of intergovernmental agreements and work done by other governments when establishing a new regulatory limit

Where authorities decide that a new regulatory limit needs to be established for wine, this should be done with reference to limits already introduced by other authorities or recommended by appropriate intergovernmental organizations. If those limits exist, are suitably justified by the available science and are applicable taking account of any national or regional distinctives in the country proposing to



introduce the new limit, it would foster harmonization if the limit established was consistent with that imposed or recommended elsewhere. Care should be exercised to ensure that any adjustments to limits also take manufacturing realities fully into account.

**Principle:** Governments are respectfully requested to give due regard to intergovernmental agreements and work done by other authorities when establishing new regulatory limits.

### 3.4. Use common scientific units for the expression of regulatory limits

It is frequently the case when limits are set by governments, that they are expressed using different scientific units than used in other markets. This causes enormous confusion in international wine trade. Look again at Appendix I, and note that there are no less than 5 different ways that nations have chosen to express limits for methanol in wine. Note, also, that even where authorities set a limit that is identical quantitatively, they sometimes choose to express it differently in terms of units. For example, Ontario and Quebec apparently have the same limit for methanol but express it in different units. Methanol is only an illustrative example here of the confusion that also exists for all other regulatory limits established for wine around the world.

The United States industry considered this problem from a purely industry standpoint (where use of different units to express the same quantities can be problematic). It recommended to the US Government the adoption of a common set of units for expressing wine related values (see Appendix II). It would be greatly beneficial to trade in wine around the world if governments could reach agreement about the scientific units to be used in the expression of regulatory limits.

**Principle:** Governments are respectfully urged to adopt a common system of scientific units for expressing regulatory limits

### 3.5. Use a common basis for the expression of regulatory limits

#### 3.5.1. Regulatory limits for wine expressed on a per unit of alcohol basis

Appendix I shows that some countries establish limits for methanol on the basis of the volume of alcohol in the wine and not on the volume of the wine itself. This means that as the alcohol content of a wine decreases, the relative content of a given substance expressed per unit volume of alcohol will increase:

Alcohol by Volume in Wine (%)	Methanol (mg) in 1L wine	Methanol (mg) per liter of alcohol in the same wine
15	100	670
14	100	710
13	100	770
12	100	830
11	100	910

This form of expressing regulatory limits is an increasing trend in regulatory proposals from various parts of the world over the last 2 years and has several negative consequences:

- It introduces the confusion of expressing a limit in a different way than other countries do (see 3.3 above)
- It can result in wines with lower alcohol contents approaching or exceeding regulatory limits, and therefore may effectively discourage producers from reducing the alcohol in their products to meet consumer demand.
- Where some governments who are less well-versed in wine have proposed regulatory limits on a per unit alcohol basis, the limits chosen would effectively have prevented any wine from entering the country because none is made that could comply with the proposed limit.

Note that the consumer is not exposed to any more or less of the limited substance by drinking a glass of any of the wines shown in the table above, because the content of methanol (in this case) per unit volume of the wine is the same in each case.

From the above it may be seen that limits set on the basis of the volume of alcohol in the wine seem not to be in the best interests of consumers or producers.

**Principle:** Governments are respectfully recommended to express regulatory limits on a “per unit volume of wine” basis rather than “per unit volume of alcohol” in the wine.

### 3.5.2. Different acids used as the basis for Titratable Acidity results expression

Many wine producing countries choose to establish limits for the amount of titratable acidity (TA) that a wine may contain. However, some choose to calculate the acidity measurement as though all the acid measured had been tartaric acid, and to express the limit in that way. Other countries choose to calculate as though all the acid had been sulfuric acid and express the limit that way. Although two limits may be identical, basing the expression of the limit in terms of different acids makes them look different and introduces the possibility for confusion in trade.

If there are other limits that are expressed in terms of a single wine constituent, but where different countries have chosen different substances for this purpose, this should also be reviewed.

**Principle:** Governments are respectfully recommended to agree on a common way of expressing results where this is done in relation to a single wine constituent.

### 3.6. Establish analytical “de minimis” provisions, or “action levels”

Over the last 10-20 years, great strides have been made in analytical sensitivity - both in terms of the ability to quantify substances that before were very difficult to measure, but also in terms of the sensitivity of analysis. In other words, it has become possible to measure smaller and smaller quantities of substances in wine, whether grape components or other chemicals that find their way into the product in the course of normal winegrowing operations. When regulations are framed in such a way that the presence of a substance is illegal, or else triggers some labeling requirement, this clearly has the potential to cause problems when combined with increasing analytical method sensitivity. Taken to the logical extreme, one molecule of a substance in a bottle of wine (if it could be measured) would be “presence” and could determine the legality of the product and/or that of its label. The scope for the inadvertent presence of such compounds in wine grows larger and larger with the ability to detect

smaller and smaller amounts. It includes, as examples, spray-drift of pesticides from a crop on which they are permitted to an adjacent vineyard on which they are not permitted, or residues of components used in tank sanitizing agents that cross-contaminate wine. The levels in question could never have been detected 10 years ago and are so low as to pose no known health risk to consumers, yet they can and do increasingly result in market access problems for wines subjected to the more advanced analytical methods.

In this situation, it would be helpful to establish for certain compounds or classes of compounds “de minimis” values - below which the substance(s) would not be counted as “present” for regulatory purposes. This would be set at a level to preserve consumer protections but to mitigate the potentially increasing trade issues that may arise in the next few years.

**Principle: Where appropriate, Governments are respectfully requested to consider the establishment of analytical “de minimis” values for substances or classes of substances in wine - values below which they will be deemed to all intents and purposes not to be present in the wine.**

### 3.7. Transition arrangements

From time to time, governments revise the limits in their regulations and lower them for various reasons. Wherever possible, this should be an effort harmonized with other countries (see 2.2 above). There have been cases in some markets around the world where limits have been lowered and enforcement action has begun overnight, even for issues where there was no pressing public health concern. Action has been commenced against wine that was produced perhaps 18 months to 2 years before the regulatory change was made and that was in complete compliance with the rules then in existence. Product has even been shipped from the producing country in perfect compliance with the rules then in force, only to arrive at the destination market as a non-compliant product because the government of that country chose to allow no transition arrangements and implemented new rules with immediate effect. Because of the nature of wine as a product with a potentially long shelf life, it is also important that consideration be given to grandfathering stocks of product that are already produced and in market but have significant shelf life remaining, so that they are not inadvertently and unnecessarily disadvantaged by changes in regulatory provisions.

In this situation, it would be very helpful for an agreement to be reached around transition timetables and grandfathering arrangements for various kinds of proposed regulatory changes (e.g. for labeling, composition etc.) in cases where there is no pressing need to act for public health reasons.

**Principle: Governments are respectfully requested to agree upon and to allow suitable transition arrangements when limits are tightened, provided public health considerations so permit.**

## 4. Laboratory Testing

### 4.1. Accredited/Certified laboratories and analysts

Laboratory accreditation systems and certification of laboratory analysts are means to ensure that Good Laboratory Practice is being followed within an analytical laboratory for certain analyses that it performs. This gives a level of confidence in the results that a laboratory produces.

Proficiency testing programs provide a means to determine how a laboratory performs for a given analysis in comparison with other laboratories, and can highlight systematic problems and lead to corrective actions.

The authorities in some jurisdictions offer certification programs for commercial and/or producer laboratories (or analysts), indicating that those labs or individuals have demonstrated proficiency with analyses required in international trade. The results produced by such labs with those methods can then be used on certificates of analysis or in other international trade scenarios, and the certified analyst can officially sign the documentation.

As far as possible, it would be helpful if those laboratories that perform analyses related to the international trade in wine were accredited/ had certified analysts for the methods they use for international trade purposes and could demonstrate an adequate level of performance for each of those methods.

**Principle:** Analyses of wine for compliance purposes should be undertaken by suitably accredited laboratories (or overseen by certified analysts) that perform acceptably for the specific test methods used.

#### 4.2. Validated methods

Many laboratories that test wines for compliance with appropriate regulatory standards do so with methods that are validated in some way. Often this will mean that the method has been tested by 8-12 laboratories for the same sample(s) of the product for which the method is intended to be used and has demonstrated adequate performance for accuracy, repeatability etc.

It is clearly important for the international wine trade that the methods used to analyze the wines for compliance purposes are validated or have been shown by robust means to have performance characteristics that are acceptable when applied to wine.

**Principle:** Analytical methods used for wine compliance purposes should be validated and/or have a demonstrably appropriate level of performance for wine.

#### 4.3. Authenticity methods

In almost all methods for determining wine authenticity, samples are tested for a certain characteristic and the results are then compared with those from known authentic wines. Problems have arisen historically when a method has been applied to wines whose origin or method of cultivation/production was not represented in the database of authentic samples with which its results were compared. Accordingly, the authenticity of perfectly legitimate wines has from time to time been called into question and this has caused problems in international trade.

It should therefore be a recognized principle in the authenticity testing of wine, that all the factors that might potentially influence the result of an analytical procedure are identified and taken into account in the construction of the database of authentic wines. Such factors may include (*inter alia*) production region, soil, rootstock, clone, variety, irrigation, trellising and pruning systems, leaf thinning, crop



thinning, climate, microclimate, season and all the possible permutations of winemaking practices that could legitimately have been used in the production of the wine, together with the age of the sample and the conditions under which it has been stored.

**Principle:** For wine authenticity analyses, the database of authentic samples with which the test samples will be compared must be sufficiently comprehensive to avoid the mis-categorization of legitimate samples as fraudulent.

#### 4.4. Measurement uncertainty

The Methods of Analysis and Sampling Committee of the Codex Alimentarius Commission (CCMAS) has elaborated a revised explanatory note to an existing set of guidelines concerning measurement uncertainty (see Appendix III). The note makes it clear that it is anticipated that laboratories should assess the analytical uncertainty surrounding the determinations they make, and that they should make this available on request. In international trade situations, the note anticipates that the request for this information would be made.

It would clearly be a step towards objective and consistent enforcement for wines in international trade if the measurement uncertainty surrounding the various analyses was provided by the laboratories conducting the analysis, and if that information was taken into account in any decision to pursue enforcement action.

**Principle:** Laboratories testing for compliance purposes should supply measurement uncertainty information with their analytical results and the competent authorities should take this into account in interpreting analytical data

## 5. Conclusion

This document has proposed and explained several principles surrounding the establishment of regulatory limits on the one hand and the laboratory testing that is performed to establish compliance with those limits. Many of these principles are derived from real-world experiences in which unnecessary and costly problems have arisen. If all the principles mentioned above were uniformly adopted and applied by countries that trade in wine, the implications for market access and free movement of goods would be huge, but there would be no decrease in the level of protection that was afforded to consumers. Accordingly, a study of these principles by relevant governments is warmly commended, to see whether they might form the basis for an understanding among countries on these matters.

[FIVS](#) is an international federation serving trade associations and companies in the alcohol beverage industry from around the world. It provides a forum for its members to work collaboratively on legal and policy issues and communicates Federation views to national governments and international organizations.

### **Appendix 1 - International Methanol Limits for Wine**

#### **Methanol Limits in Wine 1. Limits expressed on a volume methanol/volume wine basis**

Argentina	0.35 ml/L of wine	<i>about 280 mg/L</i>
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#### **Methanol Limits in Wine 2. Limits expressed on a weight methanol /volume wine basis**

OIV	400 mg/L of wine (Red) 250 mg/L of wine (White and Rosé)	
Canada (Ontario)	400 mg/L of wine	
Canada (Quebec)	0.4g/L of wine	<i>400 mg/L</i>
China	300 mg/L of wine (Red) 250 mg/L of wine (White & Rosé)	
Japan	1 mg/cubic cm of wine	<i>1000 mg/L</i>
South Africa	300 mg/L of wine	
Switzerland	300 mg/L of wine (Red & White) 150 mg/L of wine (Rosé)	

#### **Methanol Limits in Wine 3. Limits expressed on a weight methanol /weight wine basis**

Turkey	10 mg/kg of wine	<i>about 10 mg/L</i>
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#### **Methanol Limits in Wine 4. Limits expressed on a weight methanol/ volume of alcohol in wine basis**

Australia	<u>Domestic Production:</u> White and Sparkling Wines – 2 g/L ethanol Other Products - 3 g/L ethanol <u>Imported Wines:</u> 3 g/L of ethanol
New Zealand	3 g/L of ethanol
Vietnam	3 g/L of ethanol
Taiwan	2 g/L of ethanol
Korea	2 g/L of ethanol
India	2 g/L of ethanol

#### **Methanol Limits in Wine 5. Limits expressed on a percent basis (not clear if basis is weight or volume)**

Russia	0.1% of the ethanol content
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## Appendix II

## Technical Brief

## Adoption of International Units of Measurement in United States Wine Analysis

Gordon Burns and Arthur Caputi, Jr.

The United States wine industry is competing in an increasingly global environment where attention to reduction of technical barriers to trade is an important consideration. One common existing technical barrier is the lack of a common language for expression of wine analytical results. The Wine Institute Technical Committee has adopted the consensus units described in this brief and recommends their adoption by the U.S. industry.

*Key words:* Wine analysis, international units, units of measurement, harmonization

Laboratories performing various wine and grape must and juice analyses report results in several different units of concentration. Frequently there are inconsistencies in reporting units, even within a given laboratory. It is common to find the concentration of analytes recorded in percent, g/L, g/100 mL, mg/100 mL, ppm, and mg/L on the same analytical report. This can easily cause confusion among organizations when attempting to reconcile results and can particularly become an issue in international trade.

In recent years, there has been significant progress toward acceptance of international standards, as evidenced by adoption of SI units for expression of many scientific terms and adoption of metric units for package sizes. The Wine Institute Technical Committee decided to investigate common wine analysis reporting procedures in the United States to determine how these compared to those used by the international wine community. The committee designed a survey to determine the units of concentration used by a number of U.S. wine industry laboratories for reporting of analytical results.

Eight laboratories were surveyed, representing the largest wine producers in the United States and an independent wine analysis laboratory. The Technical Committee determined that the resulting data would be representative of current U.S. wine analyses reporting practices. The results were then compiled and compared to the units used by the OIV (Office International de la Vigne et du Vin) in their Official Methods of Analysis [1]. Several differences in expression of results were observed,

but after extensive discussion the Technical Committee reached a consensus as to the units it considered most appropriate. Results of the survey, current OIV units, and units agreed to by consensus are presented in Table 1.

Two issues prevent complete accord with current OIV units of expression, as can be noted in Table 1. The first is the choice of acid in which titratable acidity is expressed. The OIV standard, and that of the European Union, is the use of sulfuric acid as the reference acid, while the committee consensus and U.S. standard is tartaric acid. The Technical Committee agreed that the U.S. reference acid should be retained for two reasons. Not only is the use of tartaric acid as the reference compound a consistent and long-standing one in the United States, but also it seems the more logical choice, since tartaric is the primary acid found in grapes.

The second issue is choice of temperature at which percentage of alcohol by volume is expressed. The international standard temperature adopted everywhere except the United States is 20 degrees Celsius (20°C). The United States still relies upon the temperature of 60 degrees Fahrenheit (60°F, or 15.56 degrees Celsius). It is the hope of the Technical Committee that the U.S. Bureau of Alcohol, Tobacco and Firearms, in the interest of international harmonization of units, will take steps to address this discrepancy.

Members of the Technical Committee and the surveyed laboratories agreed to adopt the consensus units as presented in Table 1 for purposes of international trade and to move toward adoption of the consensus units for routine internal analyses. The Technical Committee additionally recommends that the consensus units be adopted by the U.S. industry in the interests of international harmonization.

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Committee Members, Wine Institute Technical Committee, Wine Institute, 425 Market Street, Suite 1000, San Francisco, CA 94105.

Acknowledgments: The authors express their thanks to the other members of the Wine Institute Technical Committee: Terry Lee (Committee Chair), Greg Hodson, Wendell Lee, Anil Shrikhande, Jim Walls, John Franza, Tom Smith, James Huntsinger, Kathy Meechan, Richard Peterson, Michael Martini, Glenn Proctor, David Stevens, and Elle Skofis.

Manuscript submitted April 2002; revised May 2002

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**Table 1** Units of measurement used in surveyed laboratories and by the OIV, and units agreed to by consensus of the Wine Institute Technical Committee.

	Current units: laboratories								OIV	Proposed	
	IL <sup>3</sup>	A	B	C	D	E	F	G			
Total SO <sub>2</sub>	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Free SO <sub>2</sub>	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Ethanol	% v/v at 60°F	% v/v at 60°F	% v/v at 60°F	% v/v at 60°F	% v/v at 60°F	% v/v at 60°F	% v/v at 60°F	% v/v at 60°F	% v/v at 60°F	% v/v at 20°C	% v/v at 20°C
Total dry extract	g/L	g/L	g/L	g/L	g/L	g/L	g/L	g/L	g/L	g/L	g/L
Reducing sugar	g/100 mL	g/100 mL	g/100 mL	g/100 mL	g/100 mL	g/100 mL	g/10 mL	g/100 mL	g/L	g/L	g/L
Volume	mL	mL	mL	mL	mL	mL	mL	mL			mL
Sorbic acid	mg/L	mg/L	mg/L	mg/L		mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Titrateable acidity	g/100 mL as tartaric	g/100 mL as tartaric	g/100 mL as tartaric	g/100 mL as tartaric	g/100 mL as tartaric	g/100 mL as tartaric	g/100 mL as tartaric	g/100 mL as tartaric	g/100 mL as tartaric	g/L as sulfuric	g/L as tartaric
Volatile acidity	g/100 mL as acetic	g/100 mL as acetic	g/100 mL as acetic	g/100 mL as acetic	g/100 mL as acetic	g/100 mL as acetic	g/100 mL as acetic	g/100 mL as acetic	g/100 mL as acetic	g/L	g/L as acetic
Citric acid	g/L	mg/L	mg/L	g/L		g/L	g/L	mg/L	g/L	g/L	g/L
Glucose + fructose	g/100 mL	g/100 mL	g/100 mL	g/100 mL	g/100 mL	g/100 mL	g/100 mL	g/100 mL	g/100 mL	g/L	g/L
Malic acid	g/L	mg/L	mg/L	mg/L		mg/100mL	mg/L	mg/L	g/L	g/L	g/L
Tartaric acid	g/L	mg/L	mg/L	g/100 mL		g/100 mL	mg/L	g/L	g/L	g/L	g/L
Lactic acid	g/L	mg/L	mg/L	mg/L		g/L	mg/L	mg/L	g/L	g/L	g/L
Ammonia	mg/L	mg/L	mg/L	mg/L		mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Potassium	mg/L	mg/L	mg/L	mg/L			mg/L	mg/L	mg/L	mg/L	mg/L
Calcium	mg/L	mg/L	mg/L	mg/L			mg/L	mg/L	mg/L	mg/L	mg/L
Benzoic acid	mg/L	mg/L	mg/L	mg/L			mg/L	mg/L	mg/L	mg/L	mg/L
4-Ethylphenol	ng/mL	ng/g					µg/L				ug/L
Copper	mg/L	mg/L	mg/L	mg/L	mg/L		mg/L	mg/L	mg/L	mg/L	mg/L
Iron	mg/L	mg/L	mg/L	mg/L	mg/L		mg/L	mg/L	mg/L	mg/L	mg/L
Fluoride	mg/L	mg/L	mg/L	mg/L			mg/L	mg/L	mg/L	mg/L	mg/L
Magnesium	mg/L	mg/L	mg/L	mg/L			mg/L	mg/L	mg/L	mg/L	mg/L
Lead	mg/L	µg/L	µg/L				µg/L		µg/L	µg/L	ug/L
Arsenic	mg/L	µg/L	mg/L				µg/L		µg/L	mg/L	mg/L
Zinc	mg/L	µg/L	mg/L				mg/L		mg/L	mg/L	mg/L
Acetaldehyde	mg/L	mg/L	mg/L				mg/L		mg/L	mg/L	mg/L
Ethyl acetate	mg/L	mg/L	mg/L				mg/L		mg/L	mg/L	mg/L
Pesticides	mg/L	mg/L					µg/L		µg/L	mg/L	
Ethyl carbamate	ng/g	ng/g or µg/Kg	µg/Kg				µg/L		µg/L	µg/L	µg/L
Total phenolics	mg/L	mg/L	mg/L	mg/L			mg/L	mg/L	mg/L	mg/L	
Methanol	mg/L	mg/L	mg/L				mg/L		mg/L	mg/L	mg/L
Carbon dioxide	mg/100 mL	mg/100 mL	mg/100 mL	mg/100 mL	mg/100 mL	mg/L	mg/100 mL	mg/L	g/L	g/L	g/L

<sup>3</sup>IL: Independent wine analysis laboratory.



## Appendix III

REP11/MAS  
APPENDIX II

**DRAFT REVISED GUIDELINES ON MEASUREMENT UNCERTAINTY**  
**EXPLANATORY NOTES TO THE CODEX GUIDELINES ON MEASUREMENT UNCERTAINTY**  
**(To be included as an Annex to the Guidelines on Measurement Uncertainty (CAC/GL 54-2004))**  
**(At Step 8 of the Procedure)**

**1 What is Measurement Uncertainty?**

It is not always appreciated that analytical results are variable, and just how large that variability may be, particularly when low concentrations of a measurand (i.e. ppb levels) are being determined. As stated in the Guidelines, “most quantitative analytical results take the form of “ $a \pm 2u$ ” or “ $a \pm U$ ” where “ $a$ ” is the best estimate of the true value of the concentration of the measurand (the analytical result) and “ $u$ ” is the standard uncertainty to 68% level of confidence and “ $U$ ” (equal to  $2u$ ) is the expanded uncertainty to 95% level of confidence.. The range “ $a \pm 2u$ ” represents a 95% level of confidence in which the true value would be found. The value of “ $U$ ” or “ $2u$ ” is the value which is normally used and reported by analysts, normally referred to as “measurement uncertainty” and may be estimated in a number of different ways. ”

In food analysis it is the (approximately) 95% probability (i.e.  $2u$ ) which is used to calculate the expanded uncertainty. Other sectors may specify a different probability.

Thus measurement uncertainty can be regarded as the variability around the reported results which is quantified as the value “ $U$ ” when considering the expanded uncertainty and within which the “true” result may be expected to lie.

**2 Does the Measurement Uncertainty have to be Estimated in Codex?**

Yes, one of the requirements of the ISO/IEC 17025:2005 Standard that Codex has adopted by reference is that the measurement uncertainty of a result shall be estimated and then made available if requested. The Codex Alimentarius Commission has developed Guidelines CAC/GL 27-1997 that require laboratories involved in the import/export of foods to comply with general criteria in ISO/IEC 17025. As Codex is concerned with goods moving in international trade it would be anticipated that the request for measurement uncertainty estimates will be made.

**3 Does Measurement Uncertainty Arise From both Sampling and Analysis?**

Measurement uncertainty applies to the whole measurement process. However, this guidance only considers analytical measurement uncertainty.

In many cases uncertainty of sampling is as large as or larger than analytical measurement uncertainty. Uncertainty of sampling is often the overriding factor in conformity assessment procedures. Sampling procedures in the *General Guidelines on Sampling* are designed to take account of uncertainty of sampling.

**4 What is the Relationship between Measurement Uncertainty, the Analytical Result and the Method Used to Obtain the Result?**

The uncertainty of test results is not associated with the method of analysis. However, the estimates of analytical performance characteristics that are obtained in the validation and/or in quality control of a method may be used to estimate the uncertainty of a result in some situations. The differentiation between measurement uncertainty associated with the result and precision obtained during the validation of the method is frequently not appreciated. As a consequence precision demonstrated for a validated method (the repeatability or reproducibility standard deviation) cannot be used as the sole estimate of the measurement uncertainty without qualification. In particular additional factors such as uncertainty associated with bias, matrix effect, and competence of laboratory must be considered.

## 5 Procedures for Estimating Measurement Uncertainty

There are many procedures available for estimating the measurement uncertainty of a result. The Codex guidelines do not recommend any particular approach, but it is important that whatever approach is used, the procedure is scientifically credible. No one approach may be said to be better than any other provided the procedure used is appropriate and credible - i.e. there is no “hierarchy” of the procedures.

In general, procedures are based on a component-by-component (“bottom-up”) approach or on a “top-down” approach using data from collaborative trials, proficiency studies, validation studies or intra-laboratory quality control samples, or a combination of such data.

In the *Guidelines for the Assessment of the Competence of Testing Laboratories Involved in the Import and Export Control of Foods (CAC/GL 27-1997)* there is a requirement to use validated methods and so it is usually more cost-efficient to use data from the method validation studies rather than using another approach (i.e. the component-by-component approach).

Users of validation data should note that sources of uncertainty that are not or only partly covered by validation studies include<sup>1</sup>:

- Sampling
- Pre-treatment
- Method bias
- Variation in conditions
- Changes in sample matrix
- Imprecision in estimating method or laboratory bias

For methods operating within their defined scopes, when the reconciliation stage shows that all the identified sources have been included in the validation study or when the contributions from any remaining sources have been shown to be negligible, then the reproducibility standard deviation  $s_R$ , adjusted for concentration if necessary, may be used as the combined standard uncertainty.

It is recognised that further procedures for the estimation of measurement uncertainty are being developed, and that, in this evolving situation, further recommendations will be made as to acceptable procedures. It is anticipated that procedures based on results obtained from participation in proficiency testing programmes, as an example, will be developed.

## 6 Considerations when Estimating Measurement Uncertainty within the Context of Codex

It is important that the requirement to estimate measurement uncertainty does not impose any unnecessary additional workloads on laboratories.

When deciding on which procedure is to be used when estimating measurement uncertainty within the Codex context it is important to recognise that Codex has adopted a number of formal quality assurance measures that have to be implemented by control laboratories. In particular, such laboratories should:

- be in compliance with an internationally recognised standard (now with ISO/IEC 17025:2005 Standard); such compliance is aided by the use of internal quality control procedures,
- participate in proficiency testing programmes, and
- use validated methods.

<sup>1</sup> EURACHEM/CITAC Guide on the Use of uncertainty information in compliance assessment EURACHEM Secretariat, BAM, Berlin, 2007. This is available as a free download from <http://www.eurachem.org/>

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It is essential that the information provided as a result of these requirements being implemented is used by laboratories when estimating their measurement uncertainties in order to avoid unnecessary work being carried out by laboratories. In Codex, where there is a high emphasis being placed on the use of “validated” methods of analysis, i.e. methods which have been validated through collaborative trials, information obtained from such trials can be used in many situations.

In addition, information derived from internal quality control procedures may also be used to estimate uncertainties in some situations.

This section re-emphasises that for the analyst it is important that no unnecessary duplication of existing work is undertaken.

## 7 Values of Measurement Uncertainty Estimates *Estimations*

Stipulating information on the anticipated values of measurement uncertainty estimates is frequently not supported by analysts. The users of analytical data and the customers of the laboratories producing such data frequently ask for such information regarding the level of uncertainty that may be expected for test results. They have concerns that some laboratories underestimate the size of their uncertainties and so report unrealistically small uncertainties to their customers.

For chemical analyses, using the values of  $s_R$  from collaborative trials, it would be reasonable to anticipate that the (expanded) uncertainties reported by laboratories would be approximately the following:

Nominal Concentration	Typical Expanded Uncertainty	Expected Range of Results*
100g/100g	4%	96 to 104g/100g
10g/100g	5%	9.5 to 10.5g/100g
1g/100g	8%	0.92 to 1.08g/100g
1g/kg	11%	0.89 to 1.11g/kg
100mg/kg	16%	84 to 116mg/kg
10mg/kg	22%	7.8 to 12.2mg/kg
1mg/kg	32%	0.68 to 1.32mg/kg
< 100µg/kg	44%	0.56 x concentration to 1.44 x concentration µg/kg

\* this effectively means that values falling within these ranges may be regarded as being of the same analytical population.

It would be expected that the reported measurement uncertainties by any laboratory would not significantly exceed the value estimated from the  $s_R$  at the concentration of interest if the laboratory is in “analytical control”. Very experienced laboratories carrying out any particular analysis on a regular basis would be expected to obtain uncertainty values less than the values given above.

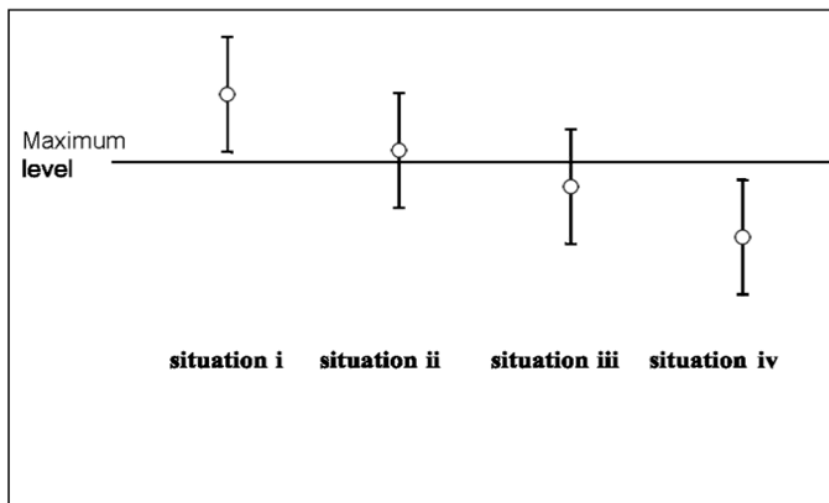
## 8 Relationship between analytical results, measurement uncertainty and recovery factors

This section attempts to explain the significance of analytical results and their associated measurement uncertainties and recoveries.

### 8.1 Measurement Uncertainty

It is important that measurement uncertainty is considered when deciding whether or not a sample meets the specification. This consideration may not apply when a direct health hazard is concerned. The significance of this can be illustrated by an example shown in the diagram below, which shows the simplest case when decisions are made based on a single test sample.

The example shown here is one where the test result is compared against the specification consisting of a maximum level. It illustrates how the concept of measurement uncertainty could be taken into account when interpreting analytical results on a tested sample.



This diagram demonstrates the importance of defining clear guidelines to allow unambiguous interpretation of analytical results with respect to their measurement uncertainties.

***Situation i***

The analytical result minus the measurement expanded uncertainty exceeds the maximum level. The result indicates that the measured analyte in the test sample is above the specification.

***Situation ii***

The analytical result exceeds the maximum level by less than the expanded measurement uncertainty.

***Situation iii***

The analytical result is less than the maximum level by less than the expanded measurement uncertainty.

***Situation iv***

The analytical result is less than the maximum level by more than the expanded measurement uncertainty.



## 8.2 Recovery

The Codex Alimentarius Commission has adopted the IUPAC Guidelines on the use of recovery information by reference (see CAC/GL 37-2001).

Analytical results should be expressed on a recovery-corrected basis where appropriate and relevant, and when corrected they have to be stated as such.

If a result has been corrected for recovery, the method by which the recovery was taken into account should also be stated. The recovery rate is to be quoted wherever possible. The uncertainty of measurement should include the uncertainty associated with the recovery correction or be quoted in conjunction with the stated recovery.

When laying down provisions for standards, it will be necessary to state whether the result obtained by a method used for analysis within conformity checks is expressed on a recovery-corrected basis or not.

## 9 Useful References

These references are provided for information purposes only.

### *Guides for the Estimation of Measurement Uncertainty*

Guide 98, Guide to the Expression of Uncertainty in Measurement (GUM) ISO, Geneva (1995)

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Eurolab technical Report No. 1/2007. Measurement Uncertainty Revisited: Alternative Approaches to Uncertainty Evaluation. Available as a free download from [www.eurolab.org](http://www.eurolab.org)

Nordtest report TR 537. Handbook for Calculation of Measurement Uncertainty in Environmental Laboratories. Available as free downloads from [www.nordtest.org](http://www.nordtest.org) (although this handbook is directed towards environmental analyses, the approaches and examples described are applicable to the results from tests on foods and feeds)

### *Procedures for the Validation of Analytical Methods and Method Performance*

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"Protocol for the Design, Conduct and Interpretation of Method Performance Studies", ed. W. Horwitz, *Pure Appl. Chem.*, 1995, **67**, 33 1-343 (adopted by Codex)

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Proficiency testing in analytical chemistry, microbiology, and laboratory medicine – working group discussions on current status, problems, and future directions. *Accreditation & Quality Assurance*, **6**: 140-146

*Compliance*

EURACHEM/CITAC Guide on the Use of uncertainty information in compliance assessment EURACHEM, 2007. This is available as a free download from <http://www.eurachem.org/>

*Terminology*

ISO (2nd ed., 1993) VIM “International Vocabulary of Basic and General Terms in Metrology”. Geneva

ISO Guide 99, International Vocabulary of Basic and General Terms in Metrology, 3rd Ed., VIM3, ISO, Geneva (2008)





# Regulatory Principles to Enhance Coherence and Facilitate Trade in Wine – Part 2

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## 1 Executive Summary

Following the production and endorsement by FIVS of the original 12 principles on establishing regulatory limits for wine and testing for compliance by analysis, and as anticipated at the time, several additional principles have been identified and are explained and advanced in this paper. As with the previous set, implementation of these new tenets would seem to bring significant benefits in international trade in wine, without diminishing consumer protections or other damage to other policy objectives.

The following are the additional principles covered in this paper:

- In the absence of specific limits for a particular substance in wine, Governments should not apply limits developed for other foods or beverages with different background levels of the substance, production considerations and intake data.
- Enforcement activity should not normally be taken on the basis that a wine contains a non-harmful substance at levels which reflect the naturally occurring levels found in wines from the same origin, produced in accordance with good oenological practices.
- Enforcement activity should not normally be taken on the basis that a wine contains an adventitious substance at levels consistent with production in accordance with good oenological practices, and lower than relevant limits established from a public health perspective by suitably qualified experts.
- Where appropriate, permit the reporting of an analytical result as being below the limit of detection for a method (e.g. <0.05 mg/L), without interpreting this as indicating some presence of the substance in wine so as to trigger a labeling or other regulatory requirement.
- The usage level of winemaking treatment agents permitted for wines traded internationally should usually be according to GMP (Good Manufacturing Practice) where the Joint Expert Committee on Food Additives (JECFA) has set an Acceptable Daily Intake of “Not specified” (meaning there are no known health concerns with the substance). Numerical usage limits should be science-based and established with reference to the recommendations of appropriate international intergovernmental organisations (e.g. Codex Alimentarius Commission, OIV) and should not be more restrictive than these recommendations
- Specify and agree upon a method for referring to winemaking treatment substances in regulations that minimizes or eliminates the possibility of confusion due to the existence of synonyms for those substances.

- Those winemaking treatment agents that are naturally present in grapes and/or wine, are actually derived from these sources, and that are used in winemaking solely to adjust the levels of the same substances already present in grape juice or wine, should not be required to be indicated on the label of the resulting product.
- Exempt standard wine from expiration date labeling, in the light of product characteristics.
- Regulators in exporting and importing countries should establish reliable means of communicating with one another, which should be used promptly when some form of enforcement activity is being contemplated for wine in international trade.

It is hoped that this second set of principles may be considered by the members of FIVS as an extension to the contents of the original 12 principles.



## 2 Introduction

This paper may be regarded as an Appendix to the earlier document, which advanced 12 Principles concerning good practice in the establishment of regulatory limits for wine and in subsequent testing of wines for compliance with those limits by analysis, and which was endorsed by the members of FIVS.

It has been stated many times that the original 12 principles only marked the beginning of the creation of a body of work on good regulatory practice for wine, the implementation of which seems likely to have significant, positive impacts on wine trade globally. Accordingly, this paper now presents an additional nine principles.

As with the original 12 principles, those presented here all have their origin in real-life, wine trade-distorting episodes, so their practical value is already demonstrated.

It is entirely likely that further principles will emerge over time, and will be gathered into collections of a size suitable to present to FIVS members for consideration, as in the current paper.

## 3 Principles relating to the levels of substances present in wine

### 3.1 Application to wine of public safety limits developed specifically for other foods and/or beverages

The limits developed to regulate the quantity of substances of public health concern that may be present in a given food are developed based on the consideration of several factors, including:

- a review of toxicological studies related to the substance;
- Information regarding the raw materials and production processes used in making the product;
- any known matrix effects related to the product itself; and
- data that shows the contribution that can be made to total dietary intake of the limited substance by known per capita consumption levels of the foods in which it may be present at the limited value.

It is consequently entirely inappropriate to apply the limit established for a given substance of concern in one specific product to a different product where many or most of the factors listed above are likely to be completely different.

In recent times, we have seen a tendency for this very practice to be undertaken. So, for example, the limits for certain heavy metals and certain residues from packaging materials that have been developed specifically for drinking water have been applied as though they must be appropriate for wine. It is obvious, though, that production practices, raw materials, possible matrix effects, and certainly the anticipated per capita consumption of water compared with those for wine are very significantly different, so that there can be no valid basis for applying drinking water limits to wine.

Accordingly, it seems appropriate to develop a generic principle that highlights this issue and discourages the practice.

**Principle:** In the absence of specific limits for a particular substance in wine, Governments should not apply limits developed for other foods or beverages with different background levels of the substance, production considerations and intake data.

### 3.2 Naturally occurring wine components present at typical levels

There has been a flurry of instances in recent months where wine has been impeded in international trade on the basis that it contains “excessive” amounts of a non-harmful substance. Upon investigation, the substance is found to be naturally occurring in wines from the producing country in question, and present in the samples under investigation at levels which are perfectly within the typical range of values seen. This increasingly frequent scenario gives rise to this principle:

**Principle:** Governments are respectfully invited to agree that enforcement activity should not normally be taken on the basis that a wine contains a non-harmful substance in amounts which reflect the naturally occurring levels found in wines from the same origin, produced in accordance with good oenological practices.

### 3.3 Adventitious substances present in wine at levels lower than relevant limits set by qualified experts

There have been several media reports and some enforcement actions in the last two years where substances not usually present in wine, but present as a result of production in keeping with good oenological practices, were found at levels well below limits set from a public health perspective in regulations and in recommendations developed by suitably qualified experts. In one case, many consignments of product were detained and not permitted to freely access the market while discussions to explain the technical aspects of the issue were pursued and much costly testing was undertaken.

**Principle:** Governments should not normally take enforcement action on the basis that a wine contains an adventitious substance at levels consistent with production in accordance with good oenological practices, and lower than relevant limits established from a public health perspective by suitably qualified experts.

### 3.4 Reporting results where no presence was detected by analysis

It is good analytical and laboratory practice to report results according to certain well-established conventions. According to one of these, when an analysis fails to detect the presence of the substance being determined, the result will be presented as below the limit of detection for the method used. So, for example, if a method has a limit of detection of 0.05 mg/L, the result would be expressed as <0.05 mg/L (i.e. below the limit of detection).

In certain markets, results expressed in this way are being interpreted as indicating that the substance being tested for is, in fact, present in the wine (because the result is not shown as 0.00 mg/L). Then demands are made (for example) for labels to be changed to indicate that the substance is in the wine, when the result actually says it cannot be detected with the method that was employed.

**Principle:** Where appropriate, Governments are respectfully requested to permit the reporting of an analytical result as being below the limit of detection for a method (e.g. <0.05 mg/L), without interpreting

this as indicating some presence of the substance in wine so as to trigger a labeling or other regulatory requirements.

## 4 Principles relating to winemaking practices

### 4.1 Levels of use for winemaking treatment agents

It is a principle established by the Codex Alimentarius Commission in regard to food additives in general that the usage level for an additive entered into the General Standard for Food Additives (GSFA) should be according to Good Manufacturing Practice (GMP) in the case of all agents for which the Joint Expert Committee on Food Additives (JECFA) has set an Acceptable Daily Intake of “Not specified” (meaning there are no known health concerns with the substance). This principle applies unless some compelling technical justification can be produced to do otherwise.

It is a well-accepted practice in relation to food regulation to establish general standards that apply to all goods traded internationally, while allowing governments to impose stricter provisions on their own producers if they choose to do so.

Accordingly, it would seem to facilitate trade significantly if governments were to agree that they would accept GMP usage levels in internationally traded wine for those additives where JECFA has set an Acceptable Daily Intake of “Not specified”.

It is a matter of fact that there is a cost associated with every addition that is made in the course of the winemaking process, and it is also true that addition of too much of any given permitted substance will result in a product of less than optimal quality. For both these reasons, use of winemaking treatment agents is self-limiting in practice, so a GMP usage specification does not open the door to abuse. This is the experience of those countries that have chosen this path even for their domestic production. It is certainly possible for guidance to be supplied to winemakers in the case of specific treatments, indicating the approximate usage levels that might be used and may constitute good manufacturing practice in certain circumstances. This can be done through a code of practice document, for example.

Where numerical usage limits are implemented, these should be science-based and established with reference to the recommendations of appropriate international intergovernmental organisations (e.g. Codex Alimentarius Commission, OIV) and should not be more restrictive than these recommendations.

**Principle: Governments are respectfully requested to agree that the usage level of winemaking treatment agents permitted for wines traded internationally should usually be according to GMP (Good Manufacturing Practice) where the Joint Expert Committee on Food Additives (JECFA) has set an Acceptable Daily Intake of “Not specified” (meaning there are no known health concerns with the substance). Numerical usage limits should be science-based and established with reference to the recommendations of appropriate international intergovernmental organisations (e.g. Codex Alimentarius Commission, OIV) and should not be more restrictive than these recommendations**

### 4.2 Nomenclature of substances used in winemaking treatments

Many of the substances used in winemaking treatments are known by multiple different names around the world. The table below illustrates this fact, but is far from comprehensive:



Substance	Synonym(s)
Dimethyl dicarbonate (DMDC)	Dimethyl pyrocarbonate (DMPC)
Potassium bicarbonate	Potassium hydrogen carbonate
Potassium bitartrate	Potassium hydrogen tartrate
Gum Arabic	Acacia
Silicon Dioxide	Silica
Copper sulfate (sulphate)	Cupric sulfate (sulphate)
Ascorbic Acid	Vitamin C
Erythorbic Acid	Isoascorbic Acid
PVPP/PVI polymer	PVI/PVP co-polymer, Divergan HM

The potential for confusion in the interpretation, application and enforcement of winemaking regulations is very clear, and some mechanism for clarifying which substance is meant would remove the potential for inadvertent trade barriers. Two possibilities have been suggested, but there may be other approaches:

- 1) Along with the substance specified in regulations by one or more of its synonyms, give the unique CAS Registry number for the substance (Chemical Abstracts Service). This number doesn't change, regardless of the synonym that is used. Those substances not having a CAS number are probably themselves food substances not likely to be confused in regulatory entries. The International Numbering System (INS) may also be used.
- 2) Probably more difficult would be to produce a list of approved winemaking substances and specify which synonym will be used in winemaking regulations by convention.

**Principle:** Governments are respectfully requested to specify and agree upon a method for referring to winemaking treatment substances in regulations that minimizes or eliminates the possibility of confusion due to the existence of synonyms for those substances.

### 4.3 Natural grape components used as winemaking treatment agents

The uniqueness of wine as a food is well documented, and gave rise to some of the principles in the first paper on this subject. Indeed, because of its characteristics, wine is often regarded as a "single ingredient food" in many regulatory frameworks internationally. One of the ways this manifests itself is in the production of wine. The vast majority of substances that are used in winemaking naturally occur in grapes or wine, and are used solely to adjust the levels of the same substances already present in grape juice or wine. They are added to bring components such as sugar or acid into balance. In most cases, their addition is not necessary in order to arrive at a product meeting the definition of wine, but it is absolutely essential to produce a product that is optimal in balance and appealing to the consumer.

Nothing new is present in the final product because of the addition of these substances, and no test can be conducted to show that the addition has taken place. Accordingly, significant scope for confusion and trade difficulties are created in markets where their addition is required to be declared on the label. This possibility is recognized in the OIV's "International Standard for the Labelling of Wines" (2015 edition),

Section 2.3 (Information on Additives) which recommends that information should only be mandatory on the label for those *additives that are not present in wine in its natural state in significant amounts*.

There are also situations in which a requirement to declare the addition can actually penalize honest traders.

For all these reasons, it seems appropriate to recognize that such substances, when used in winemaking, should not be required to be indicated on the product label.

**Principle:** Governments are respectfully invited to agree that those winemaking treatment agents that are “natural components” of grapes, are actually derived from grapes, and that are used in winemaking solely to adjust the levels of the same substances already present in grape juice or wine, should not be required to be indicated on the label of the resulting product.

## 5 Exemption from Expiration Date Labeling

Other characteristics of bottled wine that set it apart from many foods are its microbiological stability, and its ability to last for long periods of time in the market, and even to improve in quality and complexity over time. There are some very old bottled wines that are highly prized today! For these reasons, it is not appropriate to require that standard bottled wine should be labeled with “best before”, “use by” or other such expiration date labeling terms.

**Principle:** Governments are respectfully requested to agree that standard bottled wine should be exempted from expiration date labeling, in the light of the product’s intrinsic characteristics.

## 6 Communication between Wine Regulators in cases where enforcement action is contemplated

Much of the disruption to international wine trade could be avoided if the appropriate authorities in exporting and importing countries had well-established means of communication, and used them when enforcement action was being contemplated. This would give opportunity to clear up misunderstandings and present necessary information before costly episodes commence in earnest.

**Principle:** Governments are respectfully requested to agree that regulators in exporting and importing countries should establish reliable means of communicating with one another, and that these should be used promptly when some form of enforcement activity is being contemplated for wine in international trade.

[FIVS](#) is an international federation serving trade associations and companies in the alcohol beverage industry from around the world. It provides a forum for its members to work collaboratively on legal and policy issues and communicates Federation views to national governments and international organizations.



## FIVS Social Sustainability Principles for Ethical Trading

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### Preamble

The FIVS Social Sustainability Principles for Ethical Trading (FSSPET) project was launched by FIVS in April 2015. This set of principles and values reflect the beliefs of FIVS Wine Sector Participants and are consistent with those with whom they conduct business.

The Social Sustainability Principles for Ethical Trading set the foundation for actions undertaken by participants to incorporate social responsibility into the core of their business.

The FSSPET refers to international conventions such as the Universal Declaration of Human Rights, the Children's Rights and Business Principles, United Nations (UN) Guiding Principles for Business and Human Rights, Organisation for Economic Co-operation and Development (OECD) Guidelines, UN Global Compact and International Labour Organisation (ILO) Conventions and Recommendations relevant to improve working conditions in the supply chain.

The FSSPET also refers to the FIVS Global Wine Producers Environmental Sustainability Principles.

Business enterprises that endorse the FSSPET are committed to the principles set out in this document and to conduct their businesses, within their sphere of influence, to respect human rights and ensure lawful, fair and ethical behaviour in all their commercial dealings. FSSPET and its participants pursue a constructive and open dialogue among business partners and stakeholders in order to reinforce the principles of socially responsible business. Furthermore, they see the establishment of mature relations along the supply chain as being key for sustainable businesses.

### Values

By endorsing the FSSPET Participants are guided by the following values:

1. **Continuous improvement:** To implement the elements of the FSSPET in such a way as to continually improve upon their operations and those within their supply chain.
2. **Cooperation:** Working collectively with employees, neighbours and interested stakeholders in the implementation of the principles for the betterment of the Global Wine Sector and its participants.
3. **Empowerment:** A central aim for the FSSPET is to empower Participants and their business partners, particularly in the case of producers who will be monitored, to develop their supply chains in a way that respects human and labour rights. The development of internal management systems plays a critical role in bringing the FSSPET principles to the heart of business enterprises' culture.

## Principles

FSSPET Participants expect all their business partners and suppliers to observe the FSSPET. Furthermore, Participants expect that any business partners that subscribe to these principles should be able to show evidence that they take (a) all necessary measures to ensure their own observance of the FSSPET; (b) reasonable measures to ensure that all of their business partners involved in the production process(es) observe the FSSPET.

### **1. The rights of Freedom of Association and Collective Bargaining**

Participants and business partners shall: (a) respect the right of workers to form unions in a free and democratic way; (b) not discriminate against workers because of trade union membership; and (c) respect workers' right to bargain collectively. Business partners shall not prevent workers' representatives from having access to workers in the workplace or from interacting with them.

If operating in countries where trade union activity is unlawful or where free and democratic trade union activity is not allowed, business partners shall respect this principle by allowing workers to freely elect their own representatives with whom the company can enter into dialogue about workplace issues.

### **2. No Discrimination**

Participants and business partners shall not discriminate, exclude or have a certain preference for persons on the basis of gender, age, religion, race, caste, birth, social background, disability, ethnic and national origin, nationality, membership in unions or any other legitimated organisations, political affiliation or opinions, sexual orientation, family responsibilities, marital status, diseases or any other condition that could give rise to discrimination.

### **3. Fair Remuneration**

Participants and business partners observe this principle when they respect the right of the workers to receive fair remuneration that is sufficient to provide them with a decent living for themselves and their families, as well as the social benefits legally granted, without prejudice to the specific expectations set out hereunder.

Participants and business partners shall comply, as a minimum, with wages mandated by governments' minimum wage legislation, or industry standards approved on the basis of collective bargaining, whichever is higher.

Wages are to be paid in a timely manner, regularly, and fully in legal tender.

### **4. Decent Working Hours**

Participants and business partners observe this principle when they ensure that workers work according to the Award conditions set out under State, Territory and National legislation.

### **5. Occupational Health and Safety**

Participants and business partners shall comply with occupational health and safety regulations.

Participants and business partners observe this principle when they respect the right to healthy working and living conditions of workers and local communities, without prejudice to the specific expectations set out hereunder.

The active co-operation between management and workers, and/or their representatives is essential in order to develop and implement systems towards ensuring a safe and healthy work environment.

Participants and business partners shall ensure that there are systems in place to detect, assess, avoid and respond to potential threats to the health and safety of workers. They shall take effective measures to prevent workers from having accidents, injuries or illnesses, arising from, associated with, or occurring during work. These measures should aim at minimising so far as is reasonable the causes of hazards inherent within the workplace.

Participants and business partners shall take all appropriate measures within their sphere of influence, to see to the stability and safety of the equipment and buildings they use, including residential facilities to workers when these are provided by the employer as well as to protect against any foreseeable emergency. Participant and business partners shall respect the workers' right to exit the premises from imminent danger without seeking permission.

Participants and business partners shall ensure adequate occupational medical assistance and related facilities.

Participants and business partners shall ensure access to drinking water, safe and clean eating and resting areas.

### **6. No Child Labour**

Participants and business partners will not employ directly or indirectly, children below the minimum age of completion of compulsory schooling as defined by law, which shall not be less than 15 years, unless the exceptions recognised by the ILO apply.

Participants and business partners must establish robust age-verification mechanisms as part of the recruitment process, which may not be in any way degrading or disrespectful to the worker.

### **7. Casual and Seasonal Labour**

The nature of employment in the wine sector is that at certain times, casual and seasonal labour is a significant source of employment.

Participants and business partners should ensure work is performed on the basis of a recognised and documented employment relationship, established in compliance with national legislation, custom or practice and international labour standards, whichever provides greater protection.

Before entering into employment, Participants and business partners are to provide workers with understandable information about their rights, responsibilities and employment conditions, including working hours, remuneration and terms of payment.



Participants and business partners should aim at providing decent working conditions that also support workers, both women and men, in their roles as parents or caregivers.

#### **8. No Bonded Labour**

Participants and business partners shall not engage in any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour.

Participants and business partners will risk allegations of complicity if they benefit from the use of such forms of labour by their business partners.

Participants and business partners shall act with special diligence when engaging and recruiting migrant workers both directly and indirectly.

Participants and business partners shall allow their workers the right to leave work and freely terminate their employment provided that workers give reasonable notice to the employer.

Participants and business partners shall ensure that workers are not subject to inhumane or degrading treatment, corporal punishment, mental or physical coercion and/or verbal abuse.

All disciplinary procedures must be established in writing, and are to be explained verbally to workers in clear and understandable terms.

#### **9. Protection of the Environment**

Participants and business partners observe this principle when they take the necessary measures to avoid environmental degradation, without prejudice to the specific expectations set out in this chapter.

Participants and business partners should assess significant environmental impact of operations, and establish effective policies and procedures that reflect their environmental responsibility. They will see to implement adequate measures to prevent or minimise adverse effects on the community, natural resources and the overall environment.

Participants and business partners observe this principle when they subscribe to the FIVS Global Wine Producers Environmental Sustainability Principles and are members of a national environmental program or equivalent.

#### **10. Ethical Business Behaviour**

Participants and business partners observe this principle when, and without prejudice to the goals and expectations set out in this chapter, they are not involved in any act of corruption, extortion or embezzlement, nor in any form of bribery - including but not limited to - the promising, offering, giving or accepting of any improper monetary or other incentive.

Participants and business partners are expected to keep accurate information regarding their activities, structure and performance, and should disclose these in accordance with applicable regulations and industry benchmark practices.

Furthermore, they should collect, use and otherwise process personal information (including that from workers, business partners, customers and consumers in their sphere of influence) with reasonable care. The collection, use and other processing of personal information is to comply with privacy and information security laws and regulatory requirements.

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