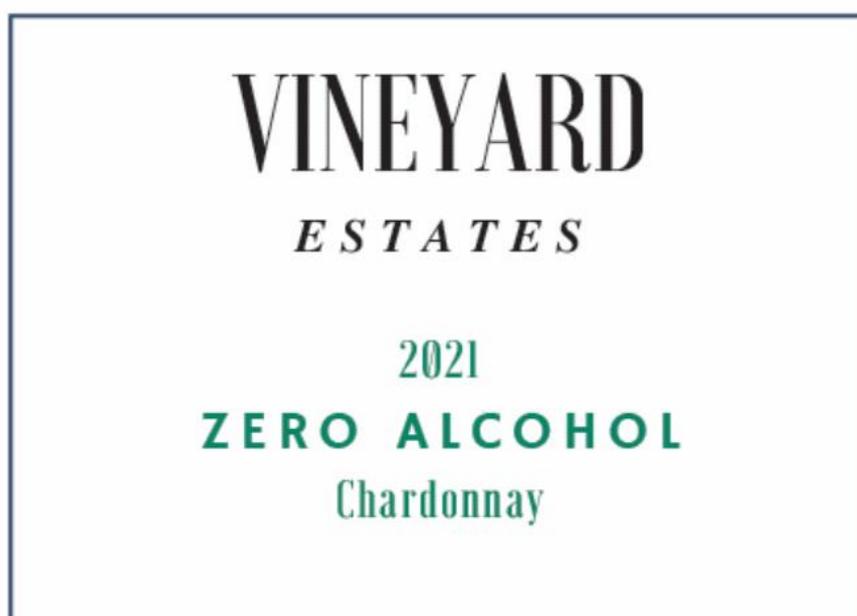


Wine
Australia
for
Australian
Wine

Low alcohol wine guide

Light, low and no alcohol
descriptors



Introduction

Demand for low and no alcoholic beverages has been experiencing large growth over recent years. This has seen an increasing number of grape products appear on retail shelves today with claims that they are ‘alcohol free’, ‘zero alcohol’, ‘de-alcoholised’ or even ‘light alcohol’. Many of these terms are defined by law and misuse of them may breach the Food Standards Code and mislead consumers.

It is important that beverage producers understand the different requirements that apply to the various ways in which light, low and no alcohol descriptors may be used. This guide is designed to assist producers understand how to use low alcohol descriptors on their labels in order to ensure their products are marketed safely and responsibly and comply with the requirements of the Australia New Zealand Food Standards Code.

None of the low alcohol descriptors outlined in this guide are mandatory, however, if you choose to use one on your label it must comply with any definitions outlined below. Most importantly, a product containing alcohol must not, either expressly or by implication, suggest that the product is a non-alcoholic beverage.

Read Wine Australia’s 2020 market bulletin on opportunities for lower and no alcohol wine [here](#).

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Disclaimer

This guide represents Wine Australia’s interpretation of the labelling requirements set out in the Australia New Zealand Food Standards Code as they apply to Australian grape products. Whilst all due care and diligence has been exercised in preparing this guide it is not intended to be a substitute for legal advice and should not be relied upon as such. Producers should be aware that interpretation of the rules is at the discretion of the various state health authorities and may differ between jurisdictions.

Wine Australia expressly disclaims all and any liability and responsibility to any person in respect of the consequences of anything done in respect of reliance, whether wholly or in part, upon this document.

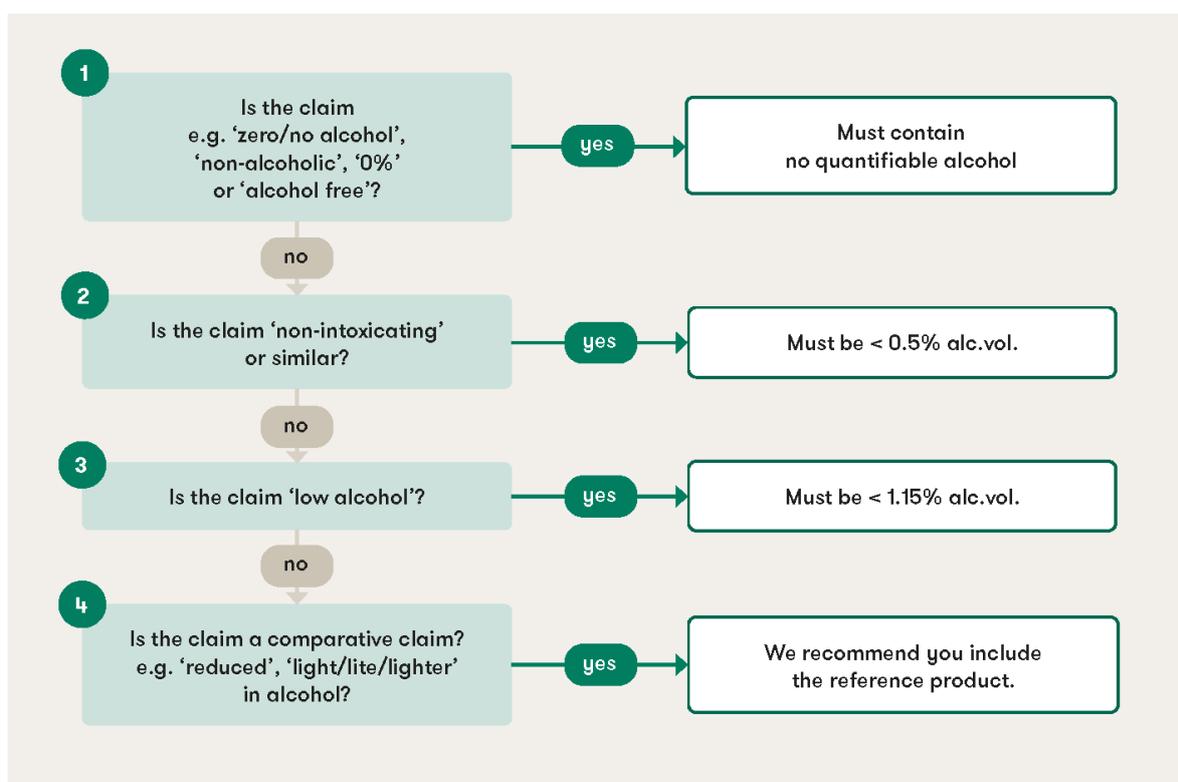
Readers are encouraged to consult the standards in the Food Standards Code: www.foodstandards.gov.au and to seek legal advice.

Representations of light, low and no alcohol

In accordance with Standard 1.2.2 of the Food Standards Code, there is a general requirement that a food be labelled sufficiently to indicate the true nature of the food.

It follows that it would be permissible to describe a product as being 'zero', 'no', 'low', 'reduced', 'de-alcoholised' wine or wine products. However, there are some traps. Standard 2.7.1 of the Food Standards Code provides criteria for some of these claims including low and no alcohol.

This guide provides further details on each of the representations of light, low and no alcohol. This flow chart will help determine whether your claim meets the requirements.



Non-alcoholic, alcohol free, zero alcohol

Non-alcoholic, alcohol free, zero alcohol, 0% alcohol or indications of similar meaning are products that do not contain any alcohol. Alcohol-free grape products are generally produced without any fermentation and are often made up of just grape juice and water. Preservatives are often added to these products to ensure fermentation does not occur after bottling.

The Food Standards Code prohibits terms that expressly or by implication suggest that a product containing alcohol is a non-alcoholic beverage. There is no maximum alcohol content defined in the Code for using such terms. Accordingly, use of a term which implies the product contains no alcohol, in the absence of mitigating information, may only be used on a product that contains no alcohol.

As test reports rarely quote zero you should be able to support a zero/no alcohol claim with a report quoting the alcohol as less than the limit of quantification (LOQ).

It should be highlighted that none of the terms listed above are defined. Rather it is the implication or overall impression given on the label that a product contains no alcohol. For example, the word 'zero' used in conjunction with other mitigating information such as 'contains less than 0.5% alcohol' would remove the implication that the product is a non-alcoholic beverage.

Non-intoxicating

Beverages that contain more than 0.5% alcohol by volume cannot be described using terms that suggest the product is 'non intoxicating' or words of similar meaning.

Low alcohol

Only beverages containing less than 1.15% alcohol by volume can be represented using the term 'low alcohol'.

Given that the Food Standards Code expressly restricts claims related to low alcohol to this defined limit, it is recommended that any comparative claims for reduced or lighter alcohol wines avoid using the words 'lower in alcohol'.

De-alcoholised

De-alcoholised wine is an oenological practice where fermented wine has had most of its alcohol removed prior to bottling. The term is not defined in the Food Standards Code but is generally understood to result in a product that contains small amounts of alcohol. These products are often labelled with statements such as:

- de-alcoholised wine
- less than 0.5% alc/vol
- less than 1.0% alc/vol

Products with less than 0.5% alcohol by volume are not required to declare the alcohol content on the label though many producers choose to voluntarily include this information.

The Food Standards Code does not regulate oenological practices as such but does authorise processing aids and additives. Accordingly, the processes used to de-alcoholise wine are not required to be approved under the Food Standards Code unless they incorporate additives or processing aids that are not permitted. If you use additives or processing aids that are not approved under the Wine Production Standard ([Standard 4.5.1](#)) you will not be able to label your product a 'wine' (see 'Use of wine/wine product' below).

Light/lite alcohol

The term 'light' is not defined in the Food Standards Code, however, claims such as 'light/lite alcohol' or 'lighter in alcohol' are considered comparative claims. Accordingly, Wine Australia recommends the label indicate the identity of the reference food and the difference between the amount of the claimed food and referenced food e.g. 'lighter in alcohol wine – at least xx% lighter in alcohol compared to [2020 brand Shiraz].

References to the presence or absence of alcohol are not classified as nutritional content claims meaning claims of 'light alcohol' will not trigger the requirement to include a nutritional information panel (NIP).

Reduced alcohol

'Reduced alcohol' is also considered a comparative claim. Refer to the information outlined above for 'light alcohol'.

Use of 'wine'

Producers should keep in mind that 'wine' is defined in the Food Standards Code as a product of the complete or partial fermentation of fresh grapes, or a mixture of that product and products derived solely from grapes with a minimum alcohol content of 4.5% by volume.

Accordingly, a product with less than 4.5% alcohol could not be called a 'wine'. Alternative descriptors that convey the true nature of the product would be necessary and here terms such as 'light alcohol wine', 'reduced alcohol wine' or 'de-alcoholised wine' (or the like) may be appropriate.

Use of 'wine product'

Any wine which has been formulated, processed, modified or mixed with other foods such as water, colours, flavours etc cannot be described as a 'wine'. The distinction between using 'wine' and 'wine product' (with the desired adjective preceding it, such as 'de-alcoholised') are that the term 'wine' can only be used if:

- the product met the definition of wine prior to it being de-alcoholised, and

- only additives and processing aids permitted for wine have been used in the production of the product.

If the production of such product were to utilise an additive or processing aid not permitted for wine (such as glycerol or water post fermentation (other than to incorporate additives or processing aids)), it would have to be labelled as a 'wine product' with added descriptors as needed, e.g. 'de-alcoholised wine product' (or the like).

The Food Standards Code requires that a 'wine product' is made of at least 70% of wine. 'Wine product' alone could be used if the wine component (which would have to be at least 70% by volume) were above 4.5% alcohol. Therefore, the minimum alcohol percentage for a wine product (in the absence of added descriptors) is 3.15% alcohol by volume.

A product can only be described as a 'wine product' if it contained at least 70% wine before being de-alcoholised.¹

Alcohol labelling statements

A product containing an alcohol content of more than 0.5% must include an alcohol statement. Products with an alcohol content falling between 0.5% and 1.15% must be labelled in words to the effect of 'Contains not more than x% alcohol by volume' (Standard 2.7.1-3(3)).

Note that for products containing less than 6.5% alcohol by volume, the alcohol statement must be correct to the nearest 0.5% alcohol by volume (Standard 2.7.1-3(4)).

For table wine and sparkling wine above 6.5% alcohol by volume, the alcohol percentage must be expressed and be correct to within 1.5% alcohol by volume (Standard 2.7.1-3(4)).

A standard drinks statement is required for any product containing over 0.5% alcohol by volume (Standard 2.7.1-4).

Exporting low alcohol wines

The information outlined above is based on the Australia New Zealand Food Standards Code and is applicable to low alcohol wines intended for sale in Australia. Other countries apply different definitions for light, low and no alcohol wines. The table below summarises some of these criteria for key export markets.

¹ Note that the definitions set out for the purposes of labelling in the Food Standards Code vary to those used to determine taxation treatment. For example, products between 1.15% and 8% alc/volume will attract excise or customs duties (rather than being subject to Wine Equalisation Tax) depending on their classification as determined by the [Australian Taxation Office](#).

Market	Table wine	Light alcohol	Low alcohol	Non-alcoholic / alcohol free
USA	7% – 14% abv	7% – 14% abv	Less than 8.5% abv	Non-alcoholic – 0.5% abv or less De-alcoholised / alcohol removed – 0.5% abv or less Alcohol free – no detectable alcohol
UK	8% – 15% abv (or up to 20% abv for Australian wines) (wines with a GI may have an abv of not less than 4.5%). Products below 8% (or 4.5% for wines with a GI) may be referred to as a ‘wine-based drink’.	30% less than comparison product	1.2% abv or below	Alcohol free – no more than 0.05% abv where alcohol has been extracted. De-alcoholised – no more than 0.5% where alcohol has been extracted. Non-alcoholic – should not be used in conjunction with a name commonly associated with an alcoholic drink.
European Union	8.5% – 15% abv (or up to 20% abv for Australian wines) (wines with a GI may have an abv of not less than 4.5%)	30% less than comparison product	1.2% abv or below	Alcohol free – 0.5% abv or below*
Canada	–	9% abv or less	Less than 1.1% abv	De-alcoholised – alcohol has been reduced to less than 1.1% abv.
China	7% abv or above	–	1.0% – 7.0% abv	0.5% – 1.0% abv

* The European Commission has proposed amendments to define ‘de-alcoholised wine’ to products not exceeding 0.5% abv and ‘partially de-alcoholised wine’ to products between 0.5% and 8.5% abv. Currently these terms are subject to national legislation (if any).

The export controls provided for under the *Wine Australia Regulations 2018* (Regulations) apply to grape products as defined in the *Wine Australia Act 2013* and Regulations and includes wine, brandy, grape spirit and products that include wine (such as ‘wine products’, ‘wine-based beverages’, low-alcohol wines and alcohol reduced wines). Non-alcoholic grape products that contain zero alcohol are not captured by the export controls.

Similarly, the [blending rules](#) apply to the grape products captured by the export controls. Note that exported ‘wine products’ are not permitted to claim a geographical indication (other than ‘Australia’) on their labels.

It is a condition of export that grape products comply with the Australia New Zealand Food Standards Code. Nevertheless, section 14(3) of the Regulations specifies that Wine Australia may approve a product for export in circumstances where:

- it does not comply with the Food Standards Code, and
- it is satisfied that the way in which it does not comply will not compromise the reputation of Australian grape products.

In circumstances where an importing country’s laws apply different definitions for low and no alcohol descriptors, Wine Australia has issued a broad exemption that permits grape products exported from Australia to be represented using those descriptors provided the product meets the definitions under the importing country’s laws.

Refer to Wine Australia’s [Licensing and Compliance Guide](#) for further information on the export controls.

The following table summarises the labelling requirements outlined in the Food Standards Code and application of the export controls outlined in the Regulations:

Low alcohol summary

Alcohol % by volume @ 20°C	HS code ⁱ	Alcohol statement format (FSC 2.7.1-3)	Alcohol tolerance (FSC 2.7.1-3)	Standard drink statement (FSC 2.7.1-4)	Representation: Low alcohol (FSC 2.7.1-5)	Representation: Non-intoxicating (FSC 2.7.1-6)	Representation: Non-alcoholic (FSC 2.7.1-7)	Health claims (FSC 1.2.7-4)	Nutrition content claims (FSC 1.2.7-4)	Nutrition Information Panel ^{***} (FSC 1.2.8-5)	Comparative claims (FSC 1.2.7-16)
Greater than 6.5% abv	2204	mL/100g, mL/100mL or % alc/vol	± 1.5% ⁱⁱ	Required	Not permitted	Not permitted	Not permitted	Not permitted	Permitted* (for energy, carbohydrate or gluten content only)	Required only if nutrition content claim is made	Permitted* (include reference food and % comparison)
Between 1.15% and 6.5% abv	2204	mL/100g, mL/100mL or % alc/vol	± 0.5%	Required	Not permitted	Not permitted	Not permitted	Not permitted	Permitted* (for energy, carbohydrate or gluten content only)	Required only if nutrition content claim is made ⁱⁱⁱ ***	Permitted* (include reference food and % comparison)
Less than 1.15% abv	2204	'Contains not more than x% alc/vol'	Not defined	Required	Permitted*	Not permitted	Not permitted	Permitted*	Permitted	Required only if nutrition content claim is made	Permitted* (include reference food and % comparison)
Between 0.5% and 1.15% abv	2204	'Contains not more than x% alc/vol'	Not defined	Required	Permitted*	Not permitted	Not permitted	Permitted*	Permitted	Required only if nutrition content claim is made	Permitted* (include reference food and % comparison)
Less than 0.5% abv	2204 if fermented 2209 if un-fermented	Not required	Not defined	Not required	Permitted*	Permitted*	Not permitted	Permitted*	Permitted	Required	Permitted* (include reference food and % comparison)
Zero alcohol	2009	Not required	N/A	Not required	Not permitted	Permitted	Permitted	Permitted	Permitted	Required	Permitted* (include reference food and % comparison)

* Check the Food Standards Code for any additional conditions of use.

ⁱ The HS Codes listed in the table above are based on Wine Australia's opinion only and should not be relied upon. Exporters and importers are advised to obtain tariff advice from [Australian Border Force](#). Products that include wine with a HS code of 2204 are captured by the export controls.

ⁱⁱ The alcohol tolerance for fortified wines (15-22% alc/vol) and brandy is $\pm 0.5\%$.

ⁱⁱⁱ A Nutrition Information Panel (NIP) is not required for 'standardised alcoholic beverages' (i.e. wine or wine products) unless a nutrition content claim is made. Unstandardised 'wine-based beverages' require a NIP whether or not a nutrition content claim is made. While the NIP requirement isn't linked to alcohol content, products below 3.15% alc/vol won't fit the 'wine product' definition, and therefore require a NIP.

About Wine Australia

Wine Australia supports a competitive wine sector by investing in research, development and adoption (RDA), growing domestic and international markets, protecting the reputation of Australian wine and administering the Export and Regional Wine Support Package (ERWSP).

Wine Australia is an Australian Commonwealth Government statutory authority, established under the *Wine Australia Act 2013*, and funded by grape growers and winemakers through levies and user-pays charges and the Australian Government, which provides matching funding for RDA investments.