Abstract

Background

The European wine sector is currently undergoing significant regulatory change. Among the most important recent developments is Regulation (EU) 2021/2117, which introduced new wine-labelling requirements that took effect on 8 December 2023. For the first time, wine products marketed in the European Union are required to provide ingredient information and nutritional declarations, thereby aligning wine more closely with the food-labelling standards established under Regulation (EU) 1169/2011.

Motivation

As someone with a strong interest in the wine industry and its continued evolution, I chose this topic because legislative developments increasingly influence how wine is produced, marketed and consumed. As I am based within the European Union, this specific wine market is the regulatory environment with which I am most closely connected. Furthermore, I aspire to pursue the Master of Wine programme in the future, in which contemporary industry issues and the critical analysis of developments in the wine industry are important parts of the curriculum. This thesis, therefore, provided an opportunity to explore a highly relevant topic while developing skills that will be valuable in future academic and professional pursuits. I have also long been interested in small-scale wine producers. Because compliance costs and administrative requirements cannot always be distributed across the same production volumes as those of larger producers, regulatory changes may be experienced differently depending on the scale of operations. Examining the impact of Regulation (EU) 2021/2117 on smaller wineries, therefore, added an important practical perspective to this study.

Research Objective

The thesis addresses the challenge of balancing increased consumer transparency with the practical and economic realities faced by industry stakeholders. More specifically, it investigates how Regulation (EU) 2021/2117 has altered the regulatory framework governing wine labelling, how these changes affect different actors within the wine supply chain, and what future developments may emerge as digitalisation and consumer expectations continue to evolve. The study was guided by three objectives: first, to provide an overview of the new legislation and its regulatory context; second, to evaluate its impact on producers, distributors and consumers; and third, to explore potential future developments in wine labelling and digital transparency.

Methodology

The research employed a qualitative methodology combining desk-based research with primary data collection. The desk research consisted of an analysis of European Union legislation, official policy documents, academic literature and industry publications relating to wine labelling, consumer information and regulatory compliance. To complement the documentary research with practical industry perspectives, semi-structured interviews were conducted with two wineries: Vejrhøj Vingård, a small Danish producer operating within the European Union, and Granville Wine Co., an Oregon-based winery exporting to the European market. The interviews provided first-hand insight into how wineries interpret and implement the new requirements and how compliance obligations are experienced in practice.

Findings and Conclusions

The thesis first examines the legal framework in place prior to 8 December 2023, when wine products remained exempt from mandatory ingredient lists and nutritional declarations, despite similar requirements applying to most food products. It then analyses how Regulation (EU) 2021/2117 amended the existing framework by introducing ingredient labelling, nutritional information, and allergen declarations, while simultaneously permitting the use of digital tools, such as QR codes, to provide detailed information electronically.

The findings demonstrate that the regulation has implications across the wine supply chain. For producers, compliance may require label redesign, website updates, legal consultation and the implementation of digital information systems. However, the extent of the burden varies considerably depending on producer size, production philosophy and export activity. The Danish winery examined in this study reported relatively limited compliance costs, partly due to its small scale and low-intervention production methods. In contrast, the American winery highlighted the added complexity of operating across multiple regulatory systems and the need to verify legal compliance.

The study also reveals differing perspectives regarding the use of QR codes. While some stakeholders view digital labelling as an efficient and flexible solution that facilitates international trade and provides access to more information than could reasonably fit on a physical label, others question whether QR codes provide equal accessibility for all consumers and whether they may reduce information visibility by requiring consumers to actively retrieve it.

For distributors and importers, the regulation introduces additional responsibilities for verifying compliance and communicating product information. From a consumer perspective, the reform clearly increases access to information and promotes transparency. However, the available evidence suggests that ingredient and nutritional information are unlikely to become decisive purchasing criteria for most consumers. Instead, the greatest benefits may accrue to specific groups, including highly engaged wine consumers and individuals with allergies or dietary concerns.

Finally, the thesis argues that Regulation (EU) 2021/2117 should be viewed as part of a broader trend towards transparency, digitalisation and consumer empowerment within the wine sector. Emerging developments in sustainability claims, traceability requirements, and health warnings indicate that wine regulation is likely to continue evolving. The research concludes that the regulation generally succeeds in balancing enhanced consumer information with sufficient flexibility to allow industry stakeholders to comply without disproportionate disruption. Although its long-term effects on consumer behaviour remain uncertain, the reform represents a significant step towards greater transparency and brings wine more closely into line with the standards applied to other food products within the European Union.