

Guidance for bulk wine exporters to China

Background

The following material has been prepared to guide potential exporters of Australian bulk wine when deciding whether to despatch wine to a bottling facility in China. It is not intended to be an exhaustive consideration of all possibilities and neither is it designed to be a mandatory condition imposed on bulk wine transactions.

Guidance

1. As with any other transfer of wine between sites you should retain samples of the despatched wine, appropriately labelled and stored, for at least six months. This may help to resolve any subsequent dispute regarding the quality or composition of the wine.
2. You should advise your customer of the vintage, variety and geographical composition of your wine to ensure the bottler can comply with Chinese labelling requirements even if the wine is blended with other components.
3. Although bulk wine bottled in China is regarded as domestic product (albeit with the possibility of being labelled as containing Australian wine as the raw material) any quality or safety problem with the final product could reflect badly on the reputation of Australian wine in general. Hence you may wish to advise your customer of the following recommendations
 - The bottler should record the shipping container number in which the wine is received and have a system in place to uniquely identify each wine and to be able to trace it throughout the production process. The bottler should record at least the temperature, the alcohol level, and the sulphur dioxide content of the wine as received.
 - Nothing other than permitted materials (see Chinese National Standard GB 2760-2014) should be added to Australian wine. Records should be maintained of sulphur dioxide, or other adjustments.
 - Wine should be stored at less than 20° C in full vessels, or in extreme cases, where the vessel is not full, the wine should be protected by inert gas in accordance with Chinese legal requirements. Vessels used for storing wine should not be used for any other purpose

- Whilst many bottling facilities would have independently audited quality management systems, such as ISO 22000, or HACCP systems, in place, an extremely critical element is to have a documented glass breakage procedure with all relevant staff trained in its application. The procedure should be easily accessible from all points where breakage may occur in the presence of open bottles. An example of the key points in such a procedure is provided below¹
 - If the wine is subsequently transferred to another facility within China, it should be accompanied by copies of all relevant documents regarding its composition and provenance.
4. Wine Australia has produced a guide to the labelling of wine in-market. It can be found [here](#).

More information

For further guidance and information on wine exports please contact Wine Australia at: exports@wineaustralia.com

¹ a. Stop the production line immediately when a bottle breakage occurs.
b. Manually remove all broken glass and place in clearly labelled, covered bins.
c. Remove and discard any open bottles in the filler/capper housing.
d. For at least two filler revolutions after re-start remove bottles from the affected head. Continue to remove until no fragments are sighted.
e. Records of time of breakage and relevant filler head must be retained. Supervisor should sign to verify the breakage procedure was correctly followed.
f. Neither compressed air nor high-pressure water should be used to clear broken glass.