



**CERTIFIED  
NATURAL**

# Code of Practice: Natural Wine

*Version 2: December 2022*



**clean  
label**  
PROJECT®  
Clean. Pure. Science.

**The Clean Label Project is a national non-profit with the mission to bring truth and transparency to consumer product labeling. Using actual retail sampling and testing, we establish evidence-based benchmarks to identify the America's best products using data and science as opposed to marketing.**

**Together, we are changing the definition of food and consumer product safety in America.**

This Code of Practice: Natural Wine is subject to revision.

Go to [www.cleanlabelproject.org](http://www.cleanlabelproject.org) to confirm the current version.

Questions, clarification, interpretations, and suggested revisions regarding this Code of Practice:  
Natural Wine may be provided in writing to:

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## **Objectives and Disclaimers**

This Code of Practice: Natural Wine provides criteria for the evaluation and marketing of manufacturers seeking compliance and certification for their products to the Clean Label Project Code of Practice: Natural Wine. The implied compliance, evaluations, and the contents contained within are limited exclusively to meeting the minimum requirements for the Clean Label Project Code of Practice: Natural Wine. It is the responsibility of the Operator to comply with all applicable state, national, and international laws such as, but not limited to, California Prop 65, FDA food labeling laws, FDA food safety laws, FDA pesticide tolerance level requirements, Country of Origin labeling, Tobacco, Tax, and Trade Bureau Laws, and USDA National Organic Program requirements, as applicable. It is also the responsibility of the Operator to comply with any applicable voluntary third-party private schemes such as, but not limited to Organic, Fair Trade, and Global Food Safety Initiative benchmarked standards.

In no way does compliance to this Code of Practice: Natural Wine imply compliance to any other state or federal regulation or private standard. The Clean Label Project does not assume, displace, or undertake to discharge any obligations or responsibilities of the manufacturer or any other party, including but not limited to those responsibilities and obligations arising from the other certifications or standards referenced within this Code of Practice: Natural Wine. Under no circumstances shall Clean Label Project or any of its affiliates be liable for direct, indirect, incidental, consequential, special, punitive or any other use of this Code of Practice: Natural Wine. While this standard is approved for use in domestic and global markets, it is the responsibility of the Operator to understand the necessary labeling and marketing laws of the intended market. This Code of Practice: Natural Wine may be revised from time to time.

Use of this Code of Practice: Natural Wine is strictly voluntary.

## Code of Practice – Natural Wine

**I. Purpose**

Over the past several years, there has been a significant increase in the number of consumer product attribute certifications. Certifications such as Organic<sup>1</sup>, Non-GMO Project<sup>2</sup>, Gluten-free<sup>3,4</sup>, and Fair Trade<sup>5</sup> all serve as markers of quality and are increasingly being looked for on packaging by consumers shopping for products that align with their belief systems. Market opportunities exist for growers, suppliers, manufacturers, brand owners, and retailers looking to curate products that meet these consumer expectations.

Within the wine industry there has been an emergence of private environmental standards including LIVE<sup>6</sup> as well as regulatory precedence through the Institute for Origins and Quality (INAO), the French Ministry for Agriculture and the French Fraud Control Office's new 'vin méthode nature'<sup>7</sup> published in 2020. In each case, there is a desire to get back to more simplistic wine production. Using more art and flexibility with what nature yields as opposed to additives and chemicals to achieve a desired flavor profile match.

The purpose of the Code of Practice is to:

1. Provide a market tool and evaluation criteria for growers, wineries, brand owners, and retailers to begin identifying, evaluating, and committing to natural wine production practices
2. Create a market opportunity for brands looking to communicate this commitment to consumers
3. Satisfy the growing consumer demand for transparency through an on-package market solution that is backed by compliance evaluation criteria
4. Create a certification standard with disclosed requirements to natural and natural path certification for wine

Where applicable, the Clean Label Project relies on domestic and international regulatory standards and tolerances as sources of inspiration.

**II. Scope**

Growers, wineries, co-manufacturers, brand owners, and retailers are eligible to apply for the Clean Label Project Code of Practice: Natural Wine

This Code of Practice outlines compliance documentation, production practices, and marketing requirements and guidelines.

**III. Limitations**

The contents of this document require producing documentation demonstrating compliance to certain minimum applicable production standards. Certification to this Code of Practice does not constitute a guarantee of 100% of products are compliant to the stated limits. There is inherent variability in agricultural goods, batches, loads, and production runs. However, QA programs that adhere to "best practices" should deliver high levels of consistency.

#### **IV. References**

<sup>1</sup> USDA National Organic Program <https://www.ams.usda.gov/rules-regulations/organic>

<sup>2</sup> Non-GMO Project Standard <http://www.nongmoproject.org/product-verification/the-standard>

<sup>3</sup> NSF Certified Gluten-free <http://www.nsf.org/consumer-resources/what-is-nsf-certification/gluten-free-certification>

<sup>4</sup> Gluten-free Certification Organization <http://www.gfco.org/>

<sup>5</sup> Fair Trade USA <http://fairtradeusa.org/>

<sup>6</sup> LIVE <https://livecertified.org/>

<sup>7</sup> <https://www.winemag.com/2020/05/19/natural-wine-definition-france/>

#### **V. Definitions**

- A. Administrator: the organization(s) contractually responsible for the Clean Label Project Code of Practice- Natural Wine implementation and oversight
- B. Awarded: An Operator that has been formally recognized by the Administrator as fulfilling the requirements as outlined in the Clean Label Project Code of Practice- Natural Wine
- C. Designation: An Operator electing to seek Compliance to the Clean Label Project Code of Practice- Natural Wine may select or by means of its production practice qualify for one of the two levels of compliance within the standard; Natural or Natural Path. The requirements for each level are outlined within the Standard.
- D. Non-Compliant: Nonconformance to established requirements within the Clean Label Project Code of Practice- Natural Wine
- E. Operator: the organization, business, entity, or person(s) responsible for Clean Label Project Code of Practice- Natural Wine compliance oversight
- F. Compliant: An Operator's product(s) found to be conforming to the Clean Label Project Code of Practice- Natural Wine

#### **VI. Compliance Framework**

##### **A. Harvest Compliance Requirements**

##### **1a. Vineyard Sourcing (if seeking compliance with "Natural")**

Operators seeking a designation of Natural shall provide documentation to prove that grapes utilized in the wine production were:

- a. Certified Organic in accordance with US, Canada, or European Standards; or
- b. Certified Biodynamic

Compliance documentation shall include:

- a. A certificate dated within the past 18-months from an accredited certification agent with the supplier and bulk wine or grapes identified
- b. A bill of lading to substantiate the purchase
- c. Production records that show traceability from bill of lading to finished bottling.

### **1b. Vineyard Sourcing (if seeking compliance with "Natural Path")**

Operators seeking a designation of Natural Path shall provide documentation to prove that grapes utilized in the wine production were:

- a. LIVE, Salmon Safe; and/or other wine-focused sustainability standards; or
- b. Provide test reports on the incoming raw material that the product tested 'free-of' Glyphosate and neonicotinoid pesticides

Compliance documentation shall include:

- a. A certificate dated within the past 18-months from an accredited certification agent with the supplier and bulk wine or grapes identified
- b. A test report from an ISO 17025 accredited analytical testing lab showing the level of detection, level of quantification, and list of pesticides screened yielding non-detect results for the bulk-wine received
- c. A bill of lading to substantiate the purchase
- d. Production records that show traceability from bill of lading to finished bottling.

### **2a. Grape handling (if seeking compliance with "Natural")**

Operators seeking a designation as Natural shall provide documentation to prove that the grapes utilized in the wine production were hand-picked.

Compliance documentation shall include:

- a. An affidavit attesting to the hand-picked nature of the grapes
- b. To substantiate the affidavit, the Operator shall provide scheduling, harvest calendars, or harvest contracts that describe the nature of the grape harvesting

### **2b. Grape handling (is seeking compliance with "Natural Path")**

There are no restrictions on the method of grape harvesting for Operators seeking a designation of Natural Path.

## **B. Production Compliance Requirements**

### **1a. Indigenous Yeast (if seeking compliance with "Natural")**

Operators seeking a designation of Natural shall provide documentation to prove that yeast utilized in the wine production were indigenous.



- a. Wine shall be fermented with ambient (native) yeast strains.

Compliance documentation shall include:

- a. Affidavit indicating that no cultured yeast was used in the production of wines

### **1b. Indigenous Yeast (if seeking compliance with "Natural Path")**

Operators seeking a designation of Natural Path shall incorporate a minimum of 50% of ambient or pied de cuve fermentations

Compliance documentation shall include:

- a. Name of supplier(s) of any non-ambient or pied de cuve fermentations
- b. A Certificate of Analysis for the yeast received
- c. Affidavit indicating that no more than 50% of the yeast used in production was from non-ambient or pied de cuve fermentations
- d. To substantiate the affidavit, production records indicating the quantity of yeast(s) used and the production batch yield shall be provided

### **2a. Enzymes and Yeast Nutrients (if seeking compliance with "Natural")**

Operators seeking a designation of Natural shall only utilize certified organic or approved for use in NOP production yeast nutrients during production. Enzymes shall not be used in production of Natural wines

Compliance documentation shall include:

- a. Name of supplier(s) of any yeast nutrient utilized in production
- b. An organic certificate with the supplier and yeast nutrient(s) used listed dated within the past 18 months
- c. A copy of label and Certificate of Analysis from the supplier
- d. Production records indicating the utilization of the specified /yeast nutrients(s)
- e. An affidavit indicating that no enzymes were used in the production of the Natural wine.

### **2b. Enzymes and Yeast Nutrients (if seeking compliance with "Natural Path")**

Operators seeking a designation of Natural Path shall only utilize certified organic or approved for use in NOP production enzymes and/or yeast nutrients during production.

Compliance documentation shall include:

- f. Name of supplier(s) of any enzyme and/or yeast nutrient utilized in production
- g. An organic certificate with the supplier and enzyme/yeast nutrient(s) used listed dated within the past 18 months
- h. A copy of label and Certificate of Analysis from the supplier
- i. Production records indicating the utilization of the specified enzyme(s)/yeast nutrients(s)

### **3a. Cultured Malolactic Bacteria (if seeking compliance with "Natural")**

Operators seeking a designation of Natural shall not be permitted to use cultured malolactic bacteria during production.

Compliance documentation shall include:

- a. An affidavit indicating that cultured malolactic bacteria are not used in the production of the Natural wine.

### **3b. Cultured Malolactic Bacteria (if seeking compliance with "Natural Path")**

Operators seeking a designation of Natural Path have no restrictions on the use of cultured malolactic bacteria during production.

Compliance documentation shall include:

- a. Name of supplier(s) of any cultured malolactic bacteria utilized in production
- b. A copy of label and Certificate of Analysis from the supplier
- c. Production records indicating the utilization of the specified cultured malolactic bacteria

### **4a. Acidification/Deacidification (if seeking compliance with "Natural")**

Operators seeking a designation of Natural shall not be permitted to perform acid additions or deacidification additive additions to the wine during production.

Compliance documentation shall include:

- a. An affidavit indicating that no acidification or deacidification additives are used in the production of the Natural wine.

### **4b. Acidification/Deacidification (if seeking compliance with "Natural Path")**

Operators seeking a designation of Natural Path shall be permitted to utilize acidification and deacidification methods to the extent that it does not alter the titratable acidity by greater than 1gram/1 liter.

Compliance documentation shall include:

- a. Name of supplier(s) of the acidification/deacidification agent being utilized in production
- b. A copy of the label and Certificate of Analysis from the supplier
- c. Production records indicating the utilization of the specified acidification/deacidification agent
- d. For all affected lots, the test result of the titratable acidity before and after the addition of the acidification/deacidification agent

#### **5. Fining Agents (if seeking compliance with EITHER "Natural" or "Natural Path")**

Operators seeking a designation of Natural or Natural Path shall be permitted to use only Vegan or approved for use in USDA NOP products fining agents.

Compliance documentation shall include:

- a. Name of supplier(s) of any fining agent utilized in production
  - a. A Materials Review Institute certificate with the supplier and fining agent(s) used listed dated within the past 18 months, if applicable, or be approved for use in an Organic Formulation by a USDA accredited certification agency
- b. A copy of label and Certificate of Analysis from the supplier
- c. Production records indicating the utilization of the specified fining agent(s)
- d. A copy of the Vegan certificate, if applicable
- e. A copy of the test report, manufacturer affidavit, or other compliance criteria used to assess the vegan-nature of the fining agent, if applicable

#### **6a. Coarse filtration (if seeking compliance with "Natural")**

Operators seeking a designation of Natural shall be permitted to use coarse filtration with the absence of diatomaceous earth pads.

Compliance documentation shall include:

- a. Name of filtration agent(s) being utilized in production
- b. An affidavit indicating that this diatomaceous earth was not used in the filtration process

#### **6b. Coarse filtration (if seeking compliance with "Natural Path")**

Operators seeking a designation of Natural Path shall have no restriction on the filtration methods used.

Compliance documentation shall include:

- c. Name of filtration agent(s) being utilized in production

**7a. Cross-flow/Sterile filtration (if seeking compliance with “Natural”)**

Operators seeking a designation of Natural shall not be permitted to use cross-flow/sterile filtration

Compliance documentation shall include:

- a. An affidavit indicating that cross-flow/sterile filtration was not utilized in production

**7b. Cross-flow/Sterile filtration (if seeking compliance with “Natural Path”)**

Operators seeking a designation of Natural Path shall have the following restrictions on the use of cross-flow/sterile filtration:

- a. Wines with residual sugar shall be permitted to use cross-flow/sterile filtration
- b. Dry wines shall not be permitted to use cross-flow/sterile filtration unless it has been formally documented that the wine is microbially unstable

Compliance documentation shall include:

- a. Type of wine and presence of residual sugar, as applicable
- b. Microbial testing completed on wine and substantiation that it is microbially unstable

**8a. Total Sulfur Dioxide (if seeking compliance with “Natural”)**

Operators seeking a designation of Natural shall not exceed 70ppm of total sulfur dioxide.

Compliance documentation shall include:

- a. Complete log of free and total sulfur dioxide analysis and sulfur dioxide additions
- b. Supplier of sulfur dioxide, if applicable
- c. Label and Certification of analysis of total sulfur dioxide, if applicable
- d. Finished product total sulfur dioxide level test report

**8b. Total Sulfur Dioxide (if seeking compliance with “Natural Path”)**

Operators seeking a designation of Natural shall not exceed 100ppm of total sulfur.

Compliance documentation shall include:

- a. Complete log of free and total sulfur dioxide analysis and sulfur dioxide additions

- b. Supplier of sulfur dioxide, if applicable
- c. Label and Certification of analysis of sulfur dioxide, if applicable
- d. Finished product total sulfur dioxide level test report

**9. Additives NOT permitted (if seeking compliance with EITHER "Natural" or "Natural Path")**

Operators seeking a designation of Natural or Natural Path shall not use the following additives:

- a. Lysozyme

Documentation shall include:

- b. An affidavit indicating that this additive is not used in the production of the Natural or Natural Path wine.

**10. Restricted Production Practices- Copper Sulfate (if seeking compliance with EITHER "Natural" or "Natural Path")**

Operators seeking a designation of Natural or Natural Path that want to reserve the right, in extreme circumstances, to utilize copper sulfate shall proactively have an escalation plan in place. The escalation plan shall detail alternative means of unpleasant odors or aromas before the use of copper sulfate.

If an escalation plan is not proactively documented and approved, copper sulfate shall NOT be permitted in production.

**11. Production practices NOT permitted (if seeking compliance with EITHER "Natural" or "Natural Path")**

Operators seeking a designation of Natural or Natural Path shall not use the following production practices:

- b. Flash pasteurization
- c. Thermovinification
- d. Reverse Osmosis
- e. Chaptalization
- f. Addition of Velcorin
- g. Other processes not permitted under the USDA NOP unless otherwise expressed permitted under section 6.E.

Documentation shall include:

- a. An affidavit indicating that these methods are not used in the production of the Natural or Natural Path wine.

## **C. Other Compliance Requirements**

### **1. Detailed Process Flow Chart and Facility Map**

All Operators seeking compliance to this Standard shall document a formal process flow chart from receipt of incoming materials through product shipping. All major points of production and key equipment shall be identified.

### **2. Acknowledgement of unannounced audit**

All Operators seeking compliance to this Standard shall acknowledge in writing that they are subject to an unannounced inspection. Recognizing the need for certain key members of personnel to be available to facilitate the audit, the Technical Administrator shall facilitate general availability from the Operator in advance. However, the exact date/time shall not be disclosed. The objective of the unannounced audit is to substantiate compliance with the Standard. The cost of the unannounced audit shall be borne by the Operator.

### **3. Acknowledgement of unannounced sampling and testing**

Recognizing the extent that this Standard places on affidavits, in certain situations, the Technical Administrator reserves the right to randomly sample and test products for compliance. Compliance areas within the Standard that lend themselves to testing include:

- a. Pesticide-residue testing
- b. Sulfite-testing and
- c. Vegan-testing

The cost of unannounced sampling and testing shall be borne by the Operator.

### **4. Risk map of parallel production, if applicable**

For Operators that make both Natural/Natural Path, and non-Natural/Natural Path, there is opportunity for cross-contamination and co-mingling within the production facility. Efforts shall be made to minimize the potential for cross-contamination and co-mingling.

Compliance documentation includes:

- a. Risk map showing the areas of the facility that are Natural/Natural Path production vs. Non-Natural/Natural Path production
- b. Cleaning and sanitation procedures for any shared equipment
- c. Training provided to staff on segregation efforts

### **5. Ingredient and Nutritional Transparency (if seeking compliance with EITHER "Natural" or "Natural Path")**

Operators seeking a designation of Natural or Natural Path shall provide an ingredient deck with nutrition facts panel on all products seeking/carrying certification.

Documentation shall include:

- a. Mock product labels indicating the applicable certification seal
- b. Mock product labels inclusive of an expanded ingredient deck with nutrition facts panel

## **6. Other**

The Clean Label Project Technical Administrator may request additional documentation as needed to substantiate compliance with this Standard.

## **D. Renewal/Ongoing Compliance**

All requirements outlined in Section VI. A-C apply.

The Administrator of the Clean Label Project shall annually confirm proof of compliance with Section VI. A-c.

It should be noted that the Clean Label Project Code of Practice- Natural Wine is a living document. The requirements will be revisited on a regular basis and proactively communicated to Operators. Operators shall be provided a minimum of 1-year implementation period when changes are made to the Clean Label Project Code of Practice- Natural Wine.

## **E. Request for Deviation**

Any request for deviation/variances to requirements of the Standard shall be provided in writing to the Technical Administrator.

Only extreme instances and Acts of God shall requests for deviation be made and subsequently considered.

The Technical Administrator in consultation with Clean Label Project, shall consider but is not obligated to grant the request for deviation and shall not be obligated to return any portion of fees paid if the Operator chooses to discontinue certification as a result of the request for deviation decision.

Requested variances shall be considered on a case-by-case basis.

Operators shall provide a written request to the Technical Administrator documenting the situation and proposed course of action for approval.

The Technical Administrator, in consultation with the Clean Label Project, shall produce a written response back to the Applicant/ Operator regarding the request for deviation within 10 business days.

## **VII. Administrator Requirements**

**A. Compliance Requirements**

1. The Technical Administrator of the Clean Label Project Code of Practice-Natural Wine standard shall perform the compliance assessment.
2. The Administrator shall perform random audit and unannounced sampling and testing of products. The cost of audits, sampling and testing shall be borne by the Operator.
3. The Administrator shall inform Operators of any non-conformities in writing after completion of their compliance evaluation.
4. In the event of a non-compliance, the Administrator reserves the right to perform increased surveillance on the Operator to ensure ongoing compliance with the Clean Label Project Code of Practice- Natural Wine requirements.
5. The Technical Administrator shall have no commercial, financial, or other conflicts of interest that could potentially compromise their status as an impartial third party suitable to determine compliance with this Standard. The Technical Administrator shall identify risks to impartiality on an ongoing basis and demonstrate how it eliminates/ reduces those ongoing risks.
6. The Technical Administrator shall make services available to all eligible Operators. Technical Administrator policies and procedures shall not be used to impede or inhibit access by applicants and access shall not be conditional based upon Operator size. The Technical Administrator may decline an application for certification in the event of conflict with Technical Administrator policies or capacity to service the Operator
7. The Technical Administrator shall be responsible for engaging with the Operator in all matters pertaining to the Standard
8. The Technical Administrator shall conduct an onsite, virtual, or desk audit to verify the processes and procedures required within the Standard. The Operator shall permit the use of teleconference and remote inspection technology to permit virtual access to the site by the authorized Technical Administrator.
9. The Technical Administrator shall conduct a technical review of audit reports, documents and records, and any other documentation as required by this Standard to determine the degree of compliance and any required corrective measures.
10. Without prejudice to the other provisions of the Standard, Technical Administrator shall take all reasonable precautions to preserve the integrity and prevent any corruption or loss, damage or destruction of the data, which is subject to this Standard.
11. The Technical Administrator shall verify the responses to compliance points are adequate and if so, approve the Operator for certification or for renewal.



Upon approval, the Technical Administrator shall provide the Certification Mark and letter of notification of certification with the listed products/ingredients approved for certification

The Technical Administrator may choose to withhold the certificate until the fees have been paid by the Operator.

12. The Technical Administrator shall be responsible for reviewing all packaging and marketing materials prior to an Operator using the certification Mark and/or label claim.

## **B. Testing & Sampling Requirements**

1. In instances where the Technical Administrator performs sampling and testing, the laboratory shall maintain ISO 17025 laboratory accreditation to ensure test result accuracy, consistency, team member training and best practice.
2. The Administrator shall sample products by simulating the consumer shopping experience, if possible. The Administrator shall procure enough sample to fulfill testing needs. This may only require that one sample be selected for testing.
3. The Administrator shall ideally procure samples through local or online retailers. If not feasible, only in extreme circumstances shall the Administrator procure samples from the Operator's website or the Operator. In that specific circumstance, the sample provided by the Operator must be in a finished sealed (unopened) package that would be sold at retail. The cost of the samples shall be borne by the Operator.
4. The Administrator shall retain a picture of the product purchased, the lot number, and the receipt that shows the date, location, and retail of purchase. This information shall be provided to the Operator for purposes of root cause analysis, investigations, and continuous improvement.

## D. Marketing Compliance Requirements

1. The Administrator shall be responsible for maintaining and publishing the list of all products bearing the Clean Label Project Certification Mark on the Clean Label Project website.
2. Any product not meeting the requirements outlined in the Clean Label Project Code of Practice Sections VI.A-C, or preventing the Administrator from fulfilling its requirements outlined in VII shall be found to be non-compliant with the Clean Label Project Code of Practice-Natural Wine and issued a Non-Compliance.
3. In the event that a Non-Compliance goes unmitigated in excess of 90 days, the Clean Label Project will remove the product from the online listing and issue a notification that the product has been dropped from listing. Additional adverse action may be executed if the Operator continues to use the Clean Label Project certification mark on the dropped product.
4. The Administrator shall confirm the Operator's compliance to the Mark Use Requirements outlined in the Brand Standard.
5. Logos available for use

Brands shall procure the formal high-resolution jpeg and images from Clean Label Project or its Technical Administrator for use in its marketing materials, presentations, and packaging. Only products that are listed on the Operator's Clean Label Project certificate shall be permitted to use the applicable Clean Label Project logo. Any questions regarding the colors, size, or to request deviations from the specified logos shall be requested in writing to the Clean Label Project Technical Administrator.

1. Clean Label Project Natural Wine Mark



2. Clean Label Project Natural Path Wine Mark



The Clean Label Project Certification mark may appear in single-color or reversed-out white when placed on complicated backgrounds where a high-contrast read of the seal is challenging. Request for the white on black and color logo options from the Clean Label Project Technical Administrator.

### 3. Mark Placement Requirements:

The Clean Label Project Certification mark shall be placed on the front or back of the product packaging. There are many instances where the award needs to be placed alongside other logos. We request that the Clean Label Project Certification mark stay within the clear space minimum size requirements.

### 4. Optional Supporting Clean Label Project Certification Mark Copy:

Brands may elect to use romance language on packaging or website to explain their Clean Label Project Certification mark. If a brand would like to add romance language, it is suggested that the draft language be shared with Clean Label Project or its Technical Administrator in advance of printing packaging.