

U.S. COMMERCIAL SERVICE

CALIFORNIA WINE EXPORT GUIDE 2013



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While starting your own wine export business can be a fun and rewarding experience, it is important to have a basic understanding of the many local, state and federal regulations concerning the sale and transportation of alcoholic beverages. To assist in this process, the Monterey Bay and San Francisco Export Assistance Centers have prepared the following guide.

Please note this guide is intended specifically for *California*-based individuals or businesses interested in exporting wine. Other states will have different rules and laws. This document is not intended as, nor should be used as, a legal guide to exporting wine overseas.

Ultimately the burden is on you, the U.S. exporter, to ensure that your business is in compliance with all laws and regulations. Please note that such rules and regulations are constantly changing.



TABLE OF CONTENTS:

STARTING YOUR WINE EXPORT BUSINESS	3
UNDERSTANDING U.S. REGULATIONS	4
FEDERAL REGULATIONS – THE TTB	4
STATE OF CALIFORNIA REGULATIONS – THE ABC	6
FINDING AN INTERNATIONAL BUYER	7
EXPORT SHIPPING AND DOCUMENTATION.....	8
SHIPPING OPTIONS (INCO TERMS)	8
WINE LOGISTICS.....	9
LAB ANALYSIS.....	10
LABELING AND CERTIFICATION REQUIREMENTS	11
CERTIFICATE OF FREE SALE.....	11
CERTIFICATE OF AGE	11
CERTIFICATE OF AUTHENTICITY.....	11
SANITARY STATEMENT/CERTIFICATE	11
MANUFACTURING PROCESS CERTIFICATES	11
EXPORT CONTROLS AND COMPLIANCE	12
EXPORT FINANCING	12
SCHEDULE B NUMBERS	12
CERTIFICATES OF ORIGIN	14
THE NAFTA CERTIFICATE OF ORIGIN	14
TOP US EXPORT MARKETS FOR WINE	14
2011 USDA OVERSEAS TRADE SHOWS	15
USDA TRADE SHOW SUPPORT STAFF.....	16
OTHER U.S. COMMERCIAL SERVICE PROGRAMS.....	16

STARTING YOUR WINE EXPORT BUSINESS

Despite the tight economy, many people around the world are turning to US wine. According to the California Wine Institute, close to 20 percent of wine produced in California is sold in other countries. In 2012, for the third year in a row, exports of wine once again exceeded \$1 billion dollars in revenue, reaching a new record of \$1.43 billion, 90 percent of which was from California. In 2011, 34% percent of U.S. wine exports by value were shipped to the 27-member countries of the European Union, accounting for \$478 million of the revenues, up 10% percent from 2010. The demand for US wine from non-traditional wine importing countries has also continued to grow. Other top markets in 2012 were: Canada, \$434 million, up 14 percent, Hong Kong, \$115 million, down 30 percent; Japan, \$111 million, up 6 percent; China, \$74 million, up 18 percent; Vietnam, \$27 million, up 22 percent; Mexico, \$20 million, up percent%; South Korea, \$16 million, up 26 percent.

“In 2012, U.S. wine exports, 90% of which were from California, reached a record high of \$1.43 Billion.

In general, most wine exporters choose to follow one of two business models:

MODEL 1 – FORMING YOUR OWN WINE EXPORT COMPANY

The first business model is chosen by individuals who may own a winery and/or plan on forming a company to purchase wine directly from a winery or wholesaler for export purposes. Exporters often choose to form their own export company if the wine company they are working with lacks the time, means, or inclination to export.

If you choose to structure your business in this manner you will be responsible for fully understanding and complying with all rules, taxes and regulations associated with the sale, transportation and storage of alcoholic beverages.

MODEL 2 - THE PARTNERSHIP MODEL

This model involves forming a partnership with a local winery or wholesaler. Under this model you do not take possession of, transport or store the wine. Your focus is exclusively on generating international orders which are sent to the winery. You receive a commission from sales generated. The winery would be responsible for processing orders and shipping the wine overseas.

Both scenarios will almost certainly involve a form of contract or business partnership. Consulting an attorney prior to forming such a partnership is strongly advised.

One of the most important factors in creating a successful wine export business is establishing a professional and positive working relationship with a winery or a wine wholesaler. ***Bear in mind that wineries and wine wholesalers are frequently approached by individuals interested in facilitating the export of their wines. It is advisable, therefore, that you be prepared and knowledgeable about your business model and the export process.***

UNDERSTANDING U.S. REGULATIONS

FEDERAL REGULATIONS – THE TTB

The Alcohol and Tobacco Tax and Trade Bureau (TTB) – U.S. Department of the Treasury
www.ttb.gov.

The TTB collects alcohol excise tax and ensures that alcohol products are labeled, advertised, and marketed in accordance with federal law. The TTB offers a Laboratory Certification Program for the export of wines and spirits to foreign markets.

In addition, the EU and many countries accept a report of analysis from a TTB-Certified Laboratory accompanying the export shipment as a condition of entry.

http://www.ttb.gov/ssd/lab_certification_information.shtml

Laboratories Certified by TTB for the Analysis of Wine

<http://www.ttb.gov/ssd/pdf/WineChemistDec12.pdf>

The TTB also offers extensive statistics and advice on changes in the wine industry for industry members, trade associations, state governments and other federal agencies through specialized wine analysts. A wine industry analyst from the TTB may be contacted for any of the following reasons.

- Maintaining contact with all phases of activity within the industry;
- Assisting in preparation of proposed legislation;
- Identifying industry changes;
- Assessing trends and current statistical results; and

Providing efficiency of service through attendance at seminars and industry meetings.

TTB Bay Area Contact:

Mari Kirrane

Wine & Trade Technical Advisor

490 North Wiget lane

Walnut Creek 94598

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WINE FOR EXPORT

According to the TTB, “federal export requirements vary depending on what product is being exported (e.g. beer, wine, or distilled spirits), whether the exporter is also the producer of the product, and/or whether the product is being exported tax paid or without payment of tax”. Since this report deals specifically with wine, the rules and laws concerning other types of alcoholic beverages are not covered here.

OBTAINING A “WHOLESALE’S BASIC PERMIT”

The Federal Alcohol Administration Act, requires anyone purchasing alcoholic beverages for resale or wholesale, either domestically or **internationally** to first obtain a Wholesaler’s Basic Permit from the (TTB).

http://www.ttb.gov/importers/importer_wholesalers.shtml

To apply for this permit, you will need to complete **TTB Form 5100.24**.

<http://www.ttb.gov/forms/f510024.pdf>

Please note you must maintain and staff a business office in the United States. To register your business in California, please visit: <http://www.sos.ca.gov/business/business.htm>

For a complete list of all necessary documents to file with your wholesale basic permit application please visit: <http://www.ttb.gov/applications/index.shtml>

If you don’t have access to an internet connection, an application packet with instructions can be obtained by calling TTB’s National Revenue Center (NRC) in Cincinnati, Ohio, at **1-877-882-3277**.

Depending on your type of business, you may be subject to a background investigation, and inspection of your business premises.

The application process can take 90 days or more.

Rules governing the sale, taxation, storage and shipment of wine are subject to change at any time. Existing rules may be modified, superseded or made obsolete by recent changes in laws and regulations. Please visit the TTB’s website at www.ttb.gov for updates.

TAXES

You may be subject to a variety of federal taxes including the wine excise tax. Federal wine tax regulations may be found here: http://www.ttb.gov/tax_audit/taxguide.shtml

Sections: 27 CFR 24.270-.279 and 26 U.S.C. 5041-5043,

For information on federal excise tax refunds, export verification procedures and drawback claims please visit: http://www.ttb.gov/itd/wine_ wholesaler_taxpaid.shtml

In addition, you may want to contact the IRS at 1-866-699-4096, to determine if you business will be liable for other types of taxes.

STATE OF CALIFORNIA REGULATIONS – THE ABC

According to the State of California Department of Alcohol Control, California companies that plan to buy wine for “export sale only,” do not need to file for a license with the State of California.

However, “Export-only” business models are subject to a few regulations governing the storage and transportation of alcohol and a time limit for export.

TIME LIMIT:

According to the ABC, if you intend to buy alcohol from a winery or licensed wholesaler you must export the wine out of the U.S. within 90 days of purchasing it.

STORAGE AND TRANSPORTATION

You must store the wine or alcohol in a licensed public warehouse or in a licensed customs bonded warehouse. (You may not store the alcohol on your own, including stacking it up in your garage or in your own non-licensed warehouse facility).

Within California you are allowed to transport alcohol to the port of export, but if you need to transport alcohol across state borders you may need special permits or licenses.

***Helpful Tip** (You might consider storing the alcohol at the winery or on the licensed premises of the wholesaler until just prior to export).*

If you have any questions you can contact the ABC at 916-419-2500.

TAXES - CALIFORNIA STATE BOARD OF EQUALIZATION (CSBE)

Depending on your business model you may be required to register for and/or pay state excise and occupational taxes. Please contact the California Excise Tax Division at 1-800-400-7115 or visit their website at: <http://www.boe.ca.gov/index.htm> Please be prepared to explain your business model to them, and ask which taxes - if any - apply to your company/business model.

LOCAL REGULATIONS:

Always check with your appropriate county or city officials to determine if a local business license is required. Ask about local tax requirements, (if any), and any applicable zoning regulations or permits.

For more information on starting your own business please contact your local small business administration office: <http://www.sba.gov>.

FINDING AN INTERNATIONAL BUYER

SELECTING A COUNTRY/MARKET IN WHICH TO SELL YOUR WINE

For help determining your target market(s), you may find the Foreign Agricultural Service market research reports useful. FAS market research reports are available at <http://www.fas.usda.gov/markettradedata.asp>

Some factors to consider may include:

- What types of wines are already in the market and how do consumers obtain them?
- How are American wines perceived?
- Is wine produced in the local market already?
- Will your wines be competitively priced?

The Foreign Agricultural Service (FAS) of the U.S. Department of Agriculture (USDA) works to improve foreign market access for U.S. products, build new markets, improve the competitive position of U.S. agriculture in the global marketplace, and provide food aid and technical assistance to foreign countries.

The FAS can help you determine wine labeling and testing requirements in a specific foreign market.

A list of overseas FAS offices can be found at: http://www.fas.usda.gov/scripts/sw/fasfield/ovs_directory_search.asp

The mission of the Wine Institute is to initiate and advocate state, federal and international public policy to enhance the environment for the responsible consumption and enjoyment of wine.

The Wine Institute's international export programs, guided by a committee of 125 California participating wineries, are aimed at educating the foreign wine trade and media about the quality and range of California wines. Analysis of foreign markets and information on market entry are also provided as an important service to wineries seeking international sales.

The Wine Institute's International Department administers the Market Access Program for the California wine industry. The Market Access Program (MAP), formerly the Market Promotion Program, uses funds from the U.S. Department of Agriculture's (USDA) Commodity Credit Corporation (CCC) to help U.S. producers, exporters, private companies, and other trade organizations finance promotional activities for U.S. agricultural products.

More information on the MAP program can be found here: <http://www.fas.usda.gov/mos/programs/map.asp>

Participation in the MAP is not restricted to Institute members. Any bonded winery in the state or an exporter/broker that represents California wines exclusively may apply for matching funds providing they meet the Small Business Administration's criteria of being a small business.

<http://www.calwinexport.com/membership/matching-funds-program>

EXPORT SHIPPING AND DOCUMENTATION

SHIPPING OPTIONS

Storing, transporting and exporting wine are subject to a variety of regulations. When it comes to shipping, the terms used often dictate who (buyer/seller) is responsible for what.

It could be said that in an ideal world your buyer will arrange to pick up the wine from your designated wholesaler or winery here in California. In this case, the burden is on the buyer to negotiate shipment charges and fees with a freight forwarder, customs broker, transport company, courier, etc...

Often times you and your overseas buyer will negotiate which party is responsible for which phase of the export process. The terms of sale in this process are often referred to as Inco terms.

Learn more about Inco terms at:

http://www.export.gov/logistics/eg_main_018118.asp

Depending on the Inco term used, you or your buyer might be responsible for such things as:

- Warehouse storage and labor
- Loading Charges
- Inland Freight
- Terminal Charges
- Forwarder's fees
- Loading on Vessel Fees
- Ocean or Air Freight Charges
- Charges on Arrival at Destination
- Duties, Import Taxes and Customs Clearance Fees

Delivery to Destination Charges

Shipping can be complex and you therefore might wish to consult with or use an experienced freight forwarder. For a list of local freight forwarders, consult your local phone directory. Because freight forwarder fees vary, you may wish to call several freight forwarders to compare prices.

LAB ANALYSIS

Wine analysis is a crucial tool for the production and sale of premium wines. The high costs of making wine make it crucial to insure that not a single gallon is ruined. Wine analysis can detect and prevent potential problems from developing. There are four areas of concern to address regarding wine analysis: the desired analytical results, volume of tests to be performed, willingness to perform the tests or send them to a laboratory, and budget constraints. Small wineries (500 cases or less) with a generous budget might consider using the services of a professional laboratory. Larger wineries (1000 cases and up) should definitely consider using an outside laboratory. The information gained from wine analysis will help in every aspect of making the perfect wine.

Baker Wine & Grape Analysis

2921 Union Rd. Ste. G
Paso Robles, California 93446
Phone: 805-226-8386
Fax: 805-456-4554
Email: info@bwga.net
Website: <http://www.bwga.net/>

Enartis Vinquiry

Michelle Bowen, Director of Laboratory Services
Phone: 707-687-2090
Email: michelle.bowen@enartisvinquiry.com
Website: <http://www.enartisvinquiry.com/>

Main Branch

7795 Bell Rd.
Windsor, CA 95492
Phone: 707-838-6312
Fax: 707-838-1765

ETS Laboratories

899 Adams Street - Suite A
St. Helena CA 94574
Phone: 707-963-4806
Fax: 707-963-1054
Email: info@etslabs.com
Website: <http://www.etslabs.com/>

LABELING AND CERTIFICATION REQUIREMENTS

If you intend to ship your wine to another U.S. state before export, you may be subject to a variety of laws concerning the interstate shipment of alcohol. Please check all applicable rules with the appropriate Federal and State authorities.

International rules and regulations vary by country.

Unless you are exporting a wine that has already been tested and approved for a particular country, you and/or your overseas buyer likely will be required to seek additional approvals from the country to which you are shipping.

For example, a foreign government may require that your wine be tested to ensure it is safe for human consumption.

You will also need to ensure that the wine meets foreign government labeling, packaging and marking requirements.

The TTB has compiled a guide via the TTB website that provides information on international import requirements for various countries for wine. These requirements may include licensing, labeling, and taxation considerations. International conditions do change frequently, however, and this document may not always reflect the most recent changes. The guide is simply intended to serve as a "starting point" for exporters interested in the requirements for the listed countries.

For up to date information please visit: <http://www.ttb.gov/itd/interre1.shtml>

Requests for the following certifications, or variations thereof, requested by foreign governments may be obtained through the Alcohol and Tobacco Tax and Trade Bureau's National Revenue Center in Cincinnati, Ohio.

- Certificate of Free Sale
- Certificate of Age
- Certificate of Authenticity
- Sanitary Statement/Certificate
- Manufacturing Process Certificate

Certification requests may be mailed to the address below or faxed to (513) 684-2979:

Alcohol and Tobacco Tax and Trade Bureau
National Revenue Center
Attn: Document Process and Analysis
550 Main Street, Ste. 8002
Cincinnati, OH 45202

EXPORT CONTROLS AND COMPLIANCE

The burden is upon the U.S. exporter of record to be knowledgeable of U.S. and foreign market regulations concerning the export of U.S. goods and services. Some foreign countries, companies, and even individuals are prohibited by law from receiving U.S. products. Penalties can be severe and could include fines and imprisonment.

Always consult with a U.S. Department of Commerce Bureau of Industry & Security (BIS) office, before exporting to new markets.

You will need to work with them to determine if a license is required. www.bis.doc.gov.

Please consult the “Lists to Check” section of the BIS website to determine if your end user is on a denied parties list:

<http://www.bis.doc.gov/ComplianceAndEnforcement/ListsToCheck.htm>

California BIS contacts:

(949) 660-0144 - Western Regional Office (located in Irvine, CA)

(408) 998-8806 - Northern California branch (located in San Jose, CA)

EXPORT FINANCING

Two federal government agencies have programs to assist in the financing of U.S. exports:

The Export Import Bank of the United States (EXIM) <http://www.exim.gov>.

The U.S. Small Business Administration (SBA) <http://www.sba.gov>.

SCHEDULE B NUMBERS

Every category of item that is exported from the United States is assigned a unique 10-digit identification code.

This 10-digit number is referred to as a Schedule B number can be used to determine import duties and fees, as well as track exports by product category from the U.S.

To determine your product’s Schedule B number, please contact the U.S. Census Bureau at:

<http://www.census.gov/foreign-trade/schedules/b/>

BELOW IS AN EXAMPLE OF SOME OF THE SCHEDULE B NUMBERS FOR WINE:

2204100000	SPARKLING WINE OF FRESH GRAPES
2204212000	EFFERVESCENT WINE OF FRESH GRAPES IN CONTAINERS HOLDING 2 LITERS OR LESS
2204214000	WINE OF FRESH GRAPES, NESOI, OF AN ALCOHOLIC STRENGTH BY VOLUME OF NOT OVER 14% VOL, IN CONTAINERS HOLDING 2 LITERS OR LESS
2204217000	WINE OF FRESH GRAPES, NESOI, OF AN ALCOHOLIC STRENGTH BY VOLUME OF OVER 14% VOL, IN CONTAINERS HOLDING 2 LITERS OR LESS
2204290020	WINE OF FRESH GRAPES, NESOI, OF AN ALCOHOLIC STRENGTH BY VOLUME NOT OVER 14% VOL, IN CONTAINERS HOLDING OVER 2 LITERS
2204290040	WINE OF FRESH GRAPES, NESOI, OF AN ALCOHOLIC STRENGTH BY VOLUME OVER 14% VOL, IN CONTAINERS HOLDING OVER 2 LITERS
2205100000	VERMOUTH AND OTHER WINE OF FRESH GRAPES FLAVORED WITH PLANTS OR AROMATIC SUBSTANCES, IN CONTAINERS HOLDING 2 LITERS OR LESS
2205900000	VERMOUTH AND OTHER WINE OF FRESH GRAPES FLAVORED WITH PLANTS OR AROMATIC SUBSTANCES, IN CONTAINERS HOLDING OVER 2 LITERS
2208200000	SPIRITS OBTAINED BY DISTILLING GRAPE WINE OR GRAPE MARC (GRAPE BRANDY)
2307000000	WINE LEES; ARGOL

It is very important that you use the correct Schedule B number on your shipping documentation. As with export compliance, fines may also apply if the incorrect Schedule B number is used. To confirm that the Schedule B number you intend to use is correct, please call the U.S. Census Bureau at 301-763-3047, press option 2.

CERTIFICATES OF ORIGIN

Some destination countries require a Certificate of Origin. The completed Certificate of Origin must be notarized and validated by a local U.S. chamber of commerce.

To determine whether a Certificate of Origin is required, contact your local U.S. Export Assistance Center at <http://www.buyusa.gov/home/export.html>

A directory of chambers of commerce in the United States can be found here: <http://www.uschamber.com/chambers/directory>

THE NAFTA CERTIFICATE OF ORIGIN

The NAFTA Certificate of Origin is used by Canada, Mexico and the United States including Puerto Rico, to determine if goods imported into these countries receive reduced or eliminated duties as specified by the North American Free Trade Agreement (NAFTA).

Please contact your local U.S. Export Assistance Center for help in determining if you should use the NAFTA Certificate of Origin. <http://www.buyusa.gov/home/export.html>

You can obtain a NAFTA Certificate of Origin form directly from U.S. Customs: http://forms.cbp.gov/pdf/CBP_Form_434.pdf

TOP INTERNATIONAL MARKETS FOR OVERALL WINE EXPORT (2012)

Country	U.S. Dollar Amount
Canada	\$415,868,534
United Kingdom	\$228,241,348
Hong Kong	\$112,275,183
Japan	\$109,697,529
China	\$70,081,291
Germany	\$55,755,035
Italy	\$39,565,528
Belgium	\$36,059,233
France	\$31,248,551
Viet Nam	\$26,668,505
Denmark	\$20,552,511
Sweden	\$18,641,805
Netherlands	\$17,882,481
Switzerland	\$14,380,975
South Korea	\$13,813,988
Sweden	\$18,641,805

*International Trade Administration, TradeStats Express

2013 USDA ENDORSED OVERSEAS TRADE SHOWS

All events are for food and beverages unless otherwise indicated.

Europe/Russia	Date	Location
IFE London	March 17-20	London, United Kingdom
European Seafood Exposition	April 23-26	Brussels, Belgium
Vitafoods	May 14-16	Geneva, Switzerland
World Food Moscow	September	Moscow, Russia
Anuga	October 5-9	Germany
Food Ingredients Europe	November	Frankfurt, Germany
Western Hemisphere		
ANTAD	March 13-15	Guadalajara, Mexico
SIAL Canada	April 30-May 2	Toronto, Canada
American Food Fair at the NRA Show	May 18-21	Chicago, Illinois
SIAL Brazil	June 25-28	San Paulo, Brazil
Abastur	August 26-29	Mexico City, Mexico
Americas Food & Beverage Show	October 21-22	United States
Africa/ Middle East		
IFEA Africa	September 18-20	Johannesburg, South Africa
Asia		
FOODEX	March 5-8	Tokyo, Japan
AAHAR	March 14-18	New Delhi, India
Food Ingredients China (FIC)	March 26-28	Shanghai, China
Food & Hotel Indonesia	April 10-13	Jakarta, Indonesia
Food & Hotel Vietnam	April 24-26	Ho Chi Minh City, Vietnam
SIAL China	May 7-9	Shanghai, China
HOFEX	May 7-10	Hong Kong
Seoul Food & Hotel Korea	May 14-17	Seoul, South Korea
Food Taipei	June 26-29	Taipei, Taiwan
Annapoorna	September 23-25	Mumbai, India
Food & Hotel Shangai	November 13-15	Shanghai, China

USDA TRADE SHOW SUPPORT STAFF CONTACTS

http://www.fas.usda.gov/aqx/trade_events/trade_events.asp

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OTHER CS PROGRAMS

Below are just a few of the ways the U.S. Commercial Service assists U.S. exporters. If you require assistance with any of the following, please feel free to contact one of our local offices: <http://export.gov/export/index.asp>

- Addressing **market access barriers** imposed by foreign governments
- Answering questions about **export licensing**, export compliance, or export regulations
- Assistance with export-related **agreements and contracts**
- **Collecting payment** from an overseas buyer
- Completing export-related **paperwork**, such as the Shippers Export Declaration (SED), and others
- Complying with foreign **customs** or shipping regulations, including **taxes and tariff rates**
- Complying with foreign standards, regulations, testing procedures, product **marking, pack-**

- aging**, or **labeling** requirements (for example RoHS, CCC, China RoHS, etc)
- Conducting **background checks** on potential overseas buyers, agents or distributors
 - Conducting foreign **market research**
 - Determining a **Schedule B number or ECCN**
 - Establishing an **overseas office**
 - Finding and screening international **trade leads**
 - Identifying and vetting new **overseas agents** or **distributors**
 - **Intellectual property** protection and **piracy** protection abroad
 - Learning about additional U.S. government programs to assist exporters
 - Learning about US government **advocacy** programs to help win **international tenders**
 - Learning more about **export financing** and **insurance** options
 - Participating in U.S. government-supported **trade shows**, **trade missions** and matchmaking events
 - **Promoting my company's products** or services via U.S. government websites or print publications
 - Promoting my product internationally through a U.S. Embassy-supported event or reception
 - Using **Free Trade Agreements** (FTAs) such as NAFTA, CAFTA-DR, and others
 - Assistance in locating international **accountants**, **lawyers** and other service providers.

Please send all comments, updates and suggestions about this report to:

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