

Regulation for the certification of Delle Venezie DO and Trevenezie IG wines

Rev	Issued on	Area of Change	Reason for Change
00	04.11.2016	-	First issue
01	24.05.2018	-	Table of Contents added
02	30.10.2018	All chapters	Revision of document layout, new coding, and document name
03	25.02.2019	Chapter 4.	Sampling activity added
04	31.08.2020	Whole document	Full new draft
05	15.10.2021	Chapter 1, Chapter 6 Par. 6.5 Chapter 10 Par. 11.2 Par. 16.1	Update of the new authorization reference; integration and correction of the forms for use by on-site operators; integration of the areas of competence of the Certification bodies (ODC); better definition of the CSI concerned parties; modification of the validity of the appointment of the members of the Appeal Review Body (ODR); modification of the application of tariffs for winemakers.
06	14.10.2022	Whole document	Update and law revision due to the entry in force of DM dated 03.03.2022 and integration of related changes in system documentation.
07	23.05.2023	Par. 6.5.2. e 6.5.5.3 Par. 6.5.6.1 Par. 11.1.1 Par. 11.2.6 Chapter 13	Change the name and acronym of the Ministry on the whole document; better specifications on the control of the yield estimate and on the acquisition of reports with measures at the Operator; integration of the use of bottles owned by Triveneta for the samples of wine and inclusion of the charge of the cost of the second analysis in the event of a complaint; additions on the inadmissibility of the Appeal.
08	23.10.2023	Cap. 4 e 5 Par. 8.1 Cap. 10 Par. 11.2.4	Updating of references and definitions; integration of methods of the treatment of incorrect product certificates; integration of an interested party into the CSI; the convocation of the hearing also by the ODR, as well as the parties.
09	21.05.2024	Cap. 4 Par. 6.5.1 Par. 11.1.1 e 11.2	Regulatory updates; inclusion of control name; integration of the management of complaints related to disagreement of the Operator on analytical values reported in product certificates; integration with a declaration of the ODR's absence from the applicant company and with reference to the judgment expressed by the applicant; Insertion of the suspension of the time-limits of the Non-Conformity in case of Appeal and management of the revocation of a measure in the case of judgment in favour of the applicant.
10	02.12.2024	Cap. 1 Par. 6.3, 6.4, 6.5, 6.5.5.3, 6.6, 11.2.4 Cap. 16 e 17	Change of the registered office address of TC and the acronym for an ODC subcontracted; revision of the frequency of updating the list of operators; change to the name of the SI DIONISO; Inclusion of validation of analyses by the Commission Secretaries; better specifications on invoicing for category of operators.
11	20.05.2025	Par. 6.5.4.2 e 6.5.6.1 Cap. 8 e 17	Additional specification about Winemakers inspection (30%) and IGT Holders, update name RG-09 Accredia; integration of the purposes of processing the privacy policy and the email address of the Responsible.

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Drafting	Revision	Approval
Micol Ripani	Denis Giorgiutti	Denis Giorgiutti
TC RGQ	TC DIR	TC DIR

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1 INTRODUCTION

Triveneta Certificazioni S.r.l. is a private body which, by Ministerial Decree, has been authorized by the MASAF to carry out control activities pursuant to Art. 64 of Law no. 238 dated 12 December 2016 concerning wine with denomination of controlled origin "Delle Venezie", or, in Slovenian, "Beneških okolišev", as well as wine with typical geographical indication "Trevenezie", or, in Slovenian, "Tri Benečije" as published in its institutional web site.

The legal and operational headquarters and references of Triveneta Certificazioni S.r.l. are:

Triveneta Certificazioni S.r.l.
Piazza del Popolo n. 52
33078 San Vito al Tagliamento (PN)
Phone: +39 0499941068
Email: info@triveneta.wine
Certified email (PEC): comunicazioni@pec.triveneta.wine
Website: www.triveneta.wine

2 PURPOSE

The purpose of this document is to establish the general contract rules through which all operators of DO and IG products, controlled by Triveneta Certificazioni S.r.l. (hereinafter even TC), can access the control and certification system.

This information complies with the legislative provisions necessary for the control and certification process entrusted to TC by the MASAF, which have been notified as required by the law and supplement the mandatory notification relating to the official assignment made by the Competent Authority.

3 FIELD OF APPLICATION

This REG-CERT applies to wine belonging to the following denominations:

DO Delle Venezie
IG Trevenezie.

This document applies to all operators participating in the wine production chain and, in particular:

- Winegrowers
- Winemakers
- Bottlers
- Grape intermediaries and wine intermediaries
- Wines Holders.

4 REGULATORY AND STATUTORY REFERENCES

Below are the main documents (regulations, laws, and documentation of the TC quality system) according to which the certification body carries out its activity:

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- Regulations for the use of Seals for DO Delle Venezie wines (REG-CONT) in force;
- (EC) Regulation No. 1308 of the Council dated 17 December 2013, establishing the common organization of agricultural markets and repealing (EEC) Regulations no. 922/72, (EEC) no. 234/79, (EC) no. 1037/2001, and (EC) no. 1234/2007 of the Council;
- Regulation (Eu) No. 1306/2013 Of The European Parliament And Of The Council of 17 December 201, on the financing, management and monitoring of the common agricultural policy and repealing Council Regulations (EEC) No. 352/78, (EC) No. 165/94, (EC) No. 2799/98, (EC) No. 814/2000, (EC) No. 1290/2005 and (EC) No. 485/2008;
- COUNCIL REGULATION (EC) No. 491/2009 OF 25 May 2009 amending Regulation (EC) No 1234/2007 on the common organisation of agricultural markets and specific provisions for certain agricultural products (Unified CMO Regulation);
- Commission Delegated Regulation (EU) 2019/934 supplementing Regulation (EU) n. 1308/2013 of the European Parliament and of the Council as regards the wine-growing areas in which the alcoholic strength may be increased, the authorized enological practices and the applicable restrictions on the production and storage of wine products, the minimum percentage of alcohol for the by-products and their elimination, as well as the publication of the OIV files;
- Commission Delegated Regulation (EU) 2019/33 supplementing Regulation (EU) no. 1308/2013 of the European Parliament and of the Council as regards applications for the protection of designations of origin, geographical indications and traditional terms in the wine sector, the opposition procedure, restrictions on use, amendments to the product specification, cancellation of protection as well as labeling and presentation;
- Implementing Regulation (EU) 2019/34 laying down detailed rules for the application of Regulation (EU) No 1308/2013 of the European Parliament and of the Council with regard to applications for the protection of designations of origin, geographical indications and traditional terms in the wine sector, the opposition procedure, amendments to the production specification, the register of protected names, the deletion of protection and the use of symbols, and the Regulation (EU) n. 1306/2013 of the European Parliament and of the Council concerning an appropriate system of controls;
- Regulation (EU) n. 2117/2021 which amends the Regulations (EU) n. 1308/2013 2013 about establishing a common organization of the markets for agricultural products; (EU) n. 1151/2012 on quality schemes for agricultural products and foodstuffs; (EU) n. 251/2014 on the definition, description, presentation, labelling and the protection of geographical indications of aromatised wine products and (EU) n. 228/2013 on laying down specific measures for agriculture in the outermost regions of the Union;
- (EU) Regulation 273/2018 dated 11 December 2017, which supplements (EU) Regulation no. 1308/2013 of the European Parliament and of the Council concerning the following: system of authorizations for vine growing systems, vineyard register, accompanying documents and certification, register of entries and dispatches, mandatory declarations, notifications and publication of notified information. This supplements (EU) Regulation no. 1306/2013 of the European Parliament and of the Council, concerning relevant controls and sanctions, and amending (EC) Regulations no. 555/2008, (EC) n. 606/2009, and (EC) no. 607/2009 of the Commission and repeals (EC) Regulation no. 436/2009 of the Commission, and the (EU) Delegated Regulation no. 2015/560 of the Commission;
- EC Regulation 274/2018 dated 11 December 2017, laying down the methods of application of (EU) Regulation no. 1308/2013 of the European Parliament and of the Council, regarding the system of authorizations for vine growing systems, certification, register of entries and dispatches, mandatory declarations and notifications, and of (EU) Regulation no. 1306/2013 of the European Parliament and of the Council as regards relevant controls and repealing Commission Implementing (EU) Regulation no. 2015/561;
- EU Regulation 2024/1143 dated 11 April 2024 on geographical indications for wines, spirit drinks and agricultural products, as well as traditional specialities guaranteed and optional

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quality indications for agricultural products, which amends the Regulations (EU) No. 1308/2013, (EU) 2019/787 and (EU) 2019/1753 and repeals Regulation (EU) No. 1151/2012;

- Law no. 238 dated 12 December 2016: Regulation concerning instructions for the cultivation of the vine and the production and trade of wine;
- Ministerial Decree no. 7552 dated 2 August 2018: System of controls and surveillance of DO and IG wines, pursuant to Article 64 of Law no. 238 dated 12 December 2016, containing the instructions for the cultivation of the vine and the production and trade of wine;
- Ministerial Decree n. 102728 dated 03.03.2022 amendments to the annexes of Ministerial Decree dated 2 August 2018, n. 7552 about "System of controls and supervision of DO and IG wines, pursuant to article 64, of law 12 December 2016, n. 238 containing the organic discipline of the cultivation of the wine and the production and trade of wine.";
- Ministerial Decree dated 12 March 2019: Regulation of analyses for DOP and IGP wine, organoleptic evaluation, activities of the Tasting Commissions for DOP wines, and related financing of activities of the Appellate Tasting Commission;
- Ministerial Decree dated 13 August 2012: National provisions implementing (EC) Regulation no. 1234/2007 of the Council, of the (EC) Application Regulation no. 607/2009 of the Commission, and of Legislative Decree n. 61/2010, as regards DOP and IGP wines, traditional terms, the labelling and presentation of certain products in the wine sector;
- Decree of 27.02.2020 "Characteristics, indications and procedures for the manufacture, use, distribution, control and cost of Seals for wines with a controlled and guaranteed designation of origin and for wines with a controlled designation of origin, and the characteristics and application of alternative control and traceability systems";
- Ministerial Decree 19.12.2023 "Amendment of Decree 27 February 2020, containing: «Characteristics, indications, methods for manufacture, use, distribution, the control and cost of State seals for wines with a controlled and guaranteed designation of origin and for wines with a controlled designation of origin, as well as the characteristics and application manner of the control and traceability alternative systems»;
- Decree No. 0093849 of 28.02.2022 "Implementing provisions of Law No. 238 of 12 December 2016: vineyard register, technical and production suitability of vineyards and annual production claim, as part of the measures of the SIAN referred to in Article 43, paragraph 1, of Decree-Law July 16, 2020, n. 76 converted with modifications from law 11 September 2020, n. 120";
- Decree Law No. 173 of 11.11.2022 "Urgent provisions in order to reorganize the responsibilities of the Ministries";
- DO Delle Venezie and IG Trevenezie Specification of wine production;
- DO Delle Venezie and IG Trevenezie Controls Plans;
- Provisions of Veneto Region, the Autonomous Region of Friuli Venezia Giulia and the Autonomous Province of Trento;
- UNI CEI EN ISO/IEC 17065:2012 Conformity Assessment. Requirements for Bodies that certify products, processes, and services.

Control plans, fee schedules (contained in the Control Plans), product specifications, regulations, and forms for companies are available, in their most updated versions, on TC's institutional website (www.triveneta.wine).

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5 TERMS, DEFINITIONS, AND ABBREVIATIONS

Certification body: third-party conformity assessment body that implements certification schemes (UNI CEI EN ISO/IEC 17065:2012).

Certification: third-party certification of the conformity of products, processes, systems, or people (RG-01). Third-party certification relating to products, processes, systems, or people (UNI CEI EN ISO/IEC 17000:2020).

Certification scheme: certification system relating to specified products, to which the same specified requirements, specific rules, and procedures apply (UNI CEI EN ISO/IEC 17065:2012)

Impartiality: the presence of objectivity - by objectivity we mean the absence of conflicts of interest or that any such conflicts have been resolved in a way that does not negatively affect the activities of the Body (UNI CEI EN ISO/IEC 17065:2012).

Complaint: expression of dissatisfaction, other than the Appeal, conveyed by a person or an organization to a Conformity Assessment Body or to an Accreditation Body, relating to the activities of such Body, and to which a response is due (UNI CEI EN ISO/IEC 17000:2020).

Appeal: request addressed by the subject of the conformity assessment to the Conformity Assessment Body, or to the Accreditation Body, for reconsideration by such Body of a decision that the latter has taken regarding the assessment (UNI CEI EN ISO/IEC 17000:2020).

Operator/(Customer): organization or person responsible vis-à-vis the certification body to ensure that the certification requirements, including product requirements, are met (UNI CEI EN ISO/IEC 17065:2012).

With regard to the activities carried out by TC, according to D.M. 7552/2018 and D.M. 03.03.2022, by operator we mean:

- a) Winegrowers: operators who produce wine grapes from vineyards registered in the national vineyard register and submit the harvest declaration in accordance with Article 33 of Commission Regulation (EU) 2018/273 of 11 December 2017.
- b) Intermediaries of grapes intended for wine-making: operators who market grapes intended, in whole or in part, for vinification without carrying out any processing, filled the harvest declaration only for the room of grapes held and grapes delivered. The inspection body acquires the list of operators who, in accordance to the Ministerial Decree of 30 June 1995, have notified their activities to the ICQRF or to the Regions.
- c) Winemakers: operators processing grapes to wine and submitting the production declaration, in accordance with Article 31 of Commission Regulation (EU) 2018/273 of 11 December 2017.
- d) Intermediaries for wine upstream products and bulk wines: operators who purchase and sell musts and wine without processing or bottling the product and have notified their activities to the inspection body.
- e) Bottlers: operators who provide for the bottling and labelling of wines and submit a notification of bottling to the control body.

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According to D.M. 12.03.2019 an additional category is distinguished:

Holders: operators in the wine supply chain who holding the lots of wine subject to analytical and/or organoleptic examinations.

Vineyard Register: tool provided for by Art. 145 of (EU) Regulation no. 1308/2013 and (EU) Delegated Regulation no. 2018/273 of the Commission dated 11 December 2017, an integral part of the SIAN (National Agriculture Information System), as well as of the Integrated Management and Control System (SIGC), and accompanied by a geographical identification system (GIS), containing updated information on the production potential (Ministerial Decree no. 7552 dated 2 August 2018).

The abbreviations and acronyms used recurrently in this document are the following:

CDC	Certification Committee
CSI	Committee for the Safeguarding of Impartiality
DO	Denomination of Origin
ICQRF	Department of the Central Inspectorate for the protection of quality and fraud prevention of agri-food products of the MASAF
IG	Geographical Indication
MASAF	Ministry of Agriculture, Food Sovereignty and Forestry
ODC	Control Body
ODR	Appeal Review Body

6 OPERATING METHODS

6.1 Access to the control system

In compliance with the provisions of Article 7 of Ministerial Decree no. 7552 dated 2 August 2018 and its amendments and additions, for all operators wishing to claim DO or IG wine production, the respective claims concerning grapes and/or requests for certification and/or bottling-related communications constitute for all intents and purposes the notification of registration (request for access) to the lists of subjects participating in the wine chain for DO Delle Venezie and IG Trevenezie wines.

Therefore, the Operator is considered registered in the supply chain lists when the documentation required by the Control Plan is received by TC, and namely:

- claim concerning the origin of grapes
- certification application
- communication concerning bottling
- request for Seals
- communications relating to in-cellar handling.

For all operators in the supply chain who, at the date of this Regulation, were not yet subject to the control system for DO Delle Venezie and IG Trevenezie wines, and for the first time intend to claim and/or use a name controlled by TC, must submit a specific request by certified e-mail pursuant to the form published on the site "Request to be subject to the control plan" (MO045) in order to register on the "List of Supervised Operators", and, by extension, to:

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- request to be subject to the Control Plan relating to the DO and/or IG specific denomination;
- accept economic conditions, payment methods, and notification of updates;
- undertake to operate in compliance with the provisions set out in Production Specification and in this Regulation;
- declare that they are aware of and accept the provisions of the Control Plans and the related documents issued by the ODC regarding their application.

This documentation, duly completed with the required information, entails, among other things, the obligation for the operators referred to in Chapter 13 below.

The documentation received is subject to the criteria envisaged for the protection of confidentiality, as required by the “Standard Customer Privacy Notice” published on the institutional website and referred to in Chapters 14 and 17.

All companies that produce products that can apply for the name DO Delle Venezie and IG Trevenezie can access the certification process regardless of:

- size
- location
- position in the supply chain categories
- position within corporate groups
- production of other products certified by other ODCs.

6.2 Application review

The certification process begins after TC has reviewed the documentation submitted by the company for access to the control system.

If necessary, TC may ask the company for any supplementary documentation.

Once these requirements have been met, the company is included in the IT systems that govern the control system.

In the event that the request does not fall within the scope of the controlled names, TC will reject the application and give to the applicant the reason for the refusal.

6.3 Registration on the list of supervised Operators

On the basis of the documentation received referred to in points 6.1 and 6.2 above, TC will enter the names of the companies in the “List of supervised Operators”, as published on its institutional website, updating the list at least biannually.

Unless the interested parties are notified of their cancellation, all subjects entered in the control system are deemed to be registered in the list of supervised Operators participating in the winemaking supply, and the registration is understood to be tacitly renewed from year to year.

6.4 IT System

TC relies upon two IT platforms (GEREM and TESSA) to manage the following:

- inspections at Winegrowers, Winemakers, Intermediaries and bottlers with the assignment of inspectors (GEREM)

- documentation relating to operators (personal data, wine stocks, product handling, request for certification, request and inventory of markings, etc.) (GEREM/TESSA)
- results of inspections with the issue of Non-Conformity Report (GEREM)
- results of the Certification Committee (GEREM/TESSA)
- filing of the documentation relating to the inspection process, minutes, supporting documentation, etc. (GEREM)
- filing of documentation concerning the certification process or sampling report, results of analyses and tasting by commissions, and product certificates (GEREM/TESSA).

If requested by email sent to info@triveneta.wine or certified email (PEC) comunicazioni@pec.triveneta.wine, the operator can use GEREM application for the request for seals/certification, wine handling, and bottling registration.

All registrations are safely recorded in a computer log that tracks all accesses and operations, which also include the IP address from which the operations were performed.

6.5 Control activities

TC relies upon the work of competent and qualified inspection staff to carry out the inspections. The inspectors are external technicians hired through subcontracting agreements, approved by MASAF, which TC has entered into with four certification bodies operating in the following areas of expertise:

Assignee body	Area of competence
Chamber of Commerce, Industry, Crafts, Tourism and Agriculture (CCIATA) of Trento	The entire territory of the Autonomous Provinces of Trento and Bolzano.
Ceviq	Autonomous Region of Friuli Venezia Giulia (with the exception of the area concerning DOC Collio).
Siquria	In the Veneto region: the province of Verona, excluding the DOC Lugana area (municipality of Peschiera del Garda) and the municipalities of Dolcè and Brentino Belluno included in the DOC Valdadige Terra dei Forti area; the entire province of Vicenza, the province of Padua limited to the municipalities of Merlara, Castelbaldo, Casale di Scodosia, Masi, and Urbana included in
Valoritalia	In the Friuli Venezia Giulia region, the DOC Collio area as described in Article 3 of the Production Regulations. In the Veneto region, the entire provinces of Belluno, Venice, Rovigo, Treviso; the province of Padua, with the exclusion of the municipalities of Merlara, Castelbaldo, Casale di Scodosia, Masi, and Urbana included in the territory of the Merlara DOC; the province of Verona, limited to the municipalities of Dolcè and Brentino Belluno included in the DOC Valdadige Terra dei Forti area and the municipality of Peschiera del Garda falling within the DOC Lugana area. Any other Operators located outside the production area, in Italy and abroad.

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In order to reduce the risk of conflicts of interest and ensure the rotation of inspection staff, the inspectors are appointed taking into account any possible incompatibilities and ensuring that the same operator is not inspected more than three consecutive time by the same inspector, also considering accesses for the controls of other schemes and other Denominations in the same company.

In this regard, the inspectors sign the rules of ethics and confidentiality directly with the ODC entrusted, with reference to the assigned TC companies.

The Assignee Bodies are accredited in accordance with UNI CEI EN ISO/IEC 17065 standards and registered in the List of Control Structures for Protected Designations of Origin (DOP) and Protected Geographical Indications (IGP) of the wine sector, pursuant to Art. 64 of Law no. 238 dated 12 December 2016, authorized by the MASAF.

TC outsources to external laboratories all tests required by the control plans.

The laboratories are accredited in accordance with UNI CEI EN ISO/IEC 17025 standards and registered in the list of laboratories authorized by the MASAF for the issue of analysis certificates in the wine sector.

The organoleptic analyses on wine batches are conducted by tasting commissions made up of technicians and experts whose secretaries and presidents are specifically appointed by TC for a three-year period, as required by Art. 7, paragraph 3 of the Ministerial Decree dated 12.03.2019.

The list of certification bodies, outsourced laboratories, and tasting commissions is published on the Body's institutional website.

6.5.1 Types of controls

The inspections conducted on operators' premises are divided into:

Documentation Audit:

conducted on all (100%) of winemakers, intermediation sites of grapes destined for winemaking (none at the time of issue of this document), companies involved in the purchase and/or sale of bulk wine intended for DO and IG production or to be DO certified and bottlers, through which the ODC verifies all data for the purpose of due diligence on the quantitative match between loading and unloading of grapes/wine destined for DO and IG production.

Standard Inspection and Inspection with Sampling:

the audit is performed by individual operators, on a random sampling basis (the percentages are established by the Control Plan), and includes inspections at Winegrowers, Winemakers (Bulk wine intermediaries and intermediation sites for grapes destined for vinification, of which none are present at the time of issue of this document), as well as inspections at Bottlers of DO and IG wines.

The TC Administrative Office informs the operators in advance of impending inspection/analyses provided for by the Control Plans, by certified email communication, or by registered letter with return receipt. This communication are not sent to the sampling company when inspection are not announced as defined by Ministerial Decree dated 03.03.2022.

At the same time, it informs the operator that the inspections will be carried out by an inspector from one of the subcontracted Bodies.

The inspector in charge will contact the company directly, providing it with his/her personal information, and setting the inspection date and time.

If the operator deems it appropriate, he/she can submit a written request for a reasoned objection relating to the inspector in charge, by certified email or registered letter (acknowledgment of receipt), within 15 days of receipt of the inspection communication.

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The inspector appointed by the ODC is recognizable through the identification tag in his/her possession, bearing the logo of the relevant ODC, and his/her name and surname, identification code and Tax ID, and a recent photo.

During the inspection, the operator must give maximum cooperation to the inspector appointed by the ODC.

If the operator does not make himself available for or does not allowed the inspection, the inspector will notify the ODC, which will send a new reminder by registered letter with return receipt or certified email.

If, following the reminder, the operator still refuses to make himself available, the competent authorities will be notified by certified mail (PEC).

Where the operator, at the end of inspection, should refused to undersigned the report, the Inspector will send the document to TC which will provide to transmit it to the company by registered letter with return receipt or certified email to attest that the control has been carried out.

6.5.2 Supervision of Winegrowers

6.5.2.1 Inspection

In compliance with the Control Plan and the Regulations applicable to the specific DO regulations, the inspection seeks to verify:

- that the conditions for eligibility to claim are still met, by ascertaining compliance with the agronomic provisions provided for by the relevant production regulations (planting layout, growing system, variety, etc.) and the uniformity with vineyard register,
- compliance with the maximum yield per hectare, as indicated by the Production Regulations.

Such inspections are divided into:

- "Estimation inspections" (carried out between the veraison -colour change - and the harvest of the grapes): inspection is carried out during the period with presence of the bunch on the plant, aimed at estimating the potential yield of the vineyard,
- "Estimation confirmation inspections": inspections carried out following the detection of critical estimation values in order to obtain a confirmation of the initial estimate value. Such Inspections must be carried out only close to the grape harvest.

The inspection is carried out in the presence of the party or his/her representative, whose proxy is attached to the inspection documentation.

6.5.3 Supervision of grape supply Intermediaries

At present, TC has not prepared any paperwork for documentation audits and inspections of this segment of the supply chain since currently there are no operators in the area of controlled DO and IG production.

Both these regulations and any relevant forms will be updated at the time of notification to the Body.

6.5.4 Supervision of Winemakers and of Intermediaries of bulk wine for becoming DO and IG labelling or DO certified wine

6.5.4.1 Documentation Audit

TC verifies, by affiliated ODC, that the load of the wine in storage (capable of becoming DO, DO certified, and IG) of each operator and so of whole DO/IG have been updated.

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Upon being entered into the control system, the operator must notify the exact quantity of product in stock. Subsequently, during normal activity, the Winemaker is required to notify the reference ODC of any variation in his product stock, and, specifically, must provide:

- copy of the transport document for any batch of bulk wine purchased or sold;
- communications of cellar operations/handling (reclassifications, downgrading communications, batches, etc.).

For this type of operator, the Control Plan does not provide for the production of new documents, except for the transmission (also by computer procedure after accessing the GEREM Management System) of a copy of the transport documents of any purchased/sold product, and a copy of documents concerning blending, mixing, reclassifications and anything else foreseen for DO or IG wines. The transfers are registered in SI Gerem by the user.

Any wine load obtained from the harvest is entered in the GEREM system by the company in the form of a substitutive declaration of deed of notoriety at the time of batch handling and, in any case, no later than December 15 of each year.

In the event that the company does not have access to the GEREM portal, it must send the ODC a communication via email on the dedicated form posted on the site (MO046 "Substitutive declaration of deed of notoriety" for DO or IG).

The ODC will subsequently verify the congruence of what has been declared with the declaration of viticultural and wine production of the Veneto Region, of the Autonomous Region of Friuli Venezia Giulia, and of the Autonomous Province of Trento.

6.5.4.2 Standard inspection

Inspection purposes is conducted on a random basis, according to the provisions of the Control Plan, and intended to verify:

- correspondence of the physical stocks and accounting information concerning the wine;
- compliance of cellar operations, on the basis of the provisions of the Production Regulations;
- accuracy of the registrations required by the applicable legislation;
- compliance with the parameters required by the Production Regulations for DO and IG wines.

For a quota (30%) of the sample drawn (verified in the period between the harvest of the grapes and first fermentation) as defined in the DM of 03.03.2022, the verification aimed at the current year, will include the assessment of the quality of the grapes, the traceability of loads and weighing, the wine-making operations of the product most in the cellar, the correspondence of the physical and accounting stock of the product held, identification of the product held in the cellar, the signs identifying the products, compliance with the technological and process requirements set out in the Regulations.

If the operator is also a Bottler the inspection will aimed to verify the correspondence between physical stocks and accounting information for bulk and bottled wines.

6.5.5 Inspection of Bottlers

6.5.5.1 Documentation Audit

TC verifies the quantitative correspondence of loads of wine suitable for DO labeling or for DO and IG production.

In this regard, the bottler must send the ODC all the documentation certifying inventory changes (sales/purchase transport documents, reclassifications, bundling, etc.) also by means of an IT procedure after accessing the GEREM computer system, or via email by means of the documentation published on the institutional website.

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Pursuant to Ministerial Decree no. 7552/2018 and its amendments and additions, in order to report the quantities of DO and IG wine bottled, the bottlers must notify via form MO028 "Communication of Bottling/" or the specific GEREM function all information relating to bottling operations no later than 7 working days from the date of completion of the process.

6.5.5.2 Foreign Documentation Audit for foreign Bottlers

Pursuant to Ministerial Decree no. 7552/2018 and its amendments and additions, foreign bottlers are also subject to the control system, where provided for by the Control Plans applicable to DO and IG production under the purview of the ODC.

These Bottlers are subject to the same requirements as Bottlers based in Italy.

TC monitors foreign bottlers by checking the handling of wine directly from the management systems, comparing it to labels sold and any bottling-related communications received. Abnormal situations are also periodically reported to ICQRF.

6.5.5.3 Analysis Audit/inspections

Pursuant to the Control Plan, the inspection is conducted on extracted batches by verifying:

- the correspondence between winery registers and the GEREM/TESSA management software (type of wine with any mentions required by the Regulations, bottling date, quantity bottled, bottle capacity, batch number, DOC certificate, and any loss);
- the existence of bulk wine load that generated the bottled wine load, by comparing the accounting records with those provided through the GEREM/D/TESSA system, and with the applicable production regulations and national and EU legislation;
- the correspondence of accounting stock with physical stock in the warehouse and verifying the correct use of labeling and packaging systems, including the containers, as set forth in the Production Regulations.

If the operator is also a Winemaker the inspection will aimed to verify the correspondence between physical stocks and accounting information for bulk wines (capable of becoming DO, DO certified) and bottled wines.

The analyses are performed according to the Control Plan and provides for the sampling of product samples already bottled (only for DO) in order to verify the compliance of the packaged product intended for consumption with:

- the certification, as set forth in Article 6 of the Ministerial Decree dated 12/03/2019, also following the results of the review analysis of the opinion of the Tasting Commission, pursuant to Art. 7 of the Ministerial Decree dated 12/03/2019, if requested by the concerned party;
- the company's own certification of Assembly.

Sampling is performed by an Inspector appointed by the ODC in the presence of a representative of the company being inspected.

The activities described in points 6.5.2, 6.5.3, 6.5.4, and 6.5.5 above are detailed in the:

Management procedure "Draw Management" (PG08)

Operating procedure "Inspection Manual" (PO04)

Operating procedure "Sampling and Analyses" (PO09)

Management procedure "Invoicing and Payment Management" (PG05).

In case of control at presence the inspector shall acquire from the operator each prior inspections reports with mesures derived from Control Bodies during the 12 months preceding the inspection relating to the wine sector.

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6.5.6 Wine sampling inspection

In compliance with the Ministerial Decree dated 12.03.2019 to Ministerial Decree no. 7552/2018 and its amendments and additions, the analyses on samples collected at the time of inspection and for certification purposes are performed by laboratories selected by TC and included in the "List of Outsourced Laboratories" published on the institutional web site.

6.5.6.1 Holders of IGT Trevenezie wines

TC carries out the inspection of the batch on stock subjected to the sample (IGT Trevenezie). The same takes the sample composed of n. 4 portions, by selecting the most recent lot/batch: n. 1 portion is left the operator, n. 1 portion is sent to the Laboratory for the planned analyses and n. 2 portions are kept by the relevant ODC until the process is closed and for at least 6 months.

The containers (bottles, caps, seals and opaque bags) used for the collection of wines are owned of the ODC and are stored in the warehouses of the ODC subcontracted.

In the case of bottled product, it is taken from the company's container/bottle.

6.5.7 Results of control activities on operators' premises

Following the completion of the control activities at the companies involved (Winegrowers, Winemakers, Intermediaries and Bottlers), the inspector in charge prepares a control/sampling report.

The report, together with any attached documentation, is signed by the operator or his/her representative, who also receives a copy. The report is transmitted to TC for evaluation by the Schema Manager and for the decision of the results by the Certification Committee.

The report is drawn up in electronic form and sent to the operator via email after affixing an electronic signature.

6.6 Request for certification for wines with Denomination

To obtain the certification of a batch or lot of wine capable of becoming DO Delle Venezie, whether in bulk or bottled, the winemaker or bottler who owns the batch or lot requests certification by completing the electronic request on the GEREM system, if enabled; alternatively, the operator can submit the application by means of dedicated form MO007 "Request for Sampling for Chemical-Physical and Organoleptic Tests of Doc Delle Venezie" (MO007) available on the TC website.

TC processes the certification application and, verified the appropriateness, assigns the collection to an inspector who performs the sampling using bottles owned by ODC at the operator's site. A product aliquot is forwarded to the Laboratory for chemical-physical analyses and another to the Tasting Commission for the completion of sensory analyses, only after the validation of analyses values by the Commission Secretaries.

The positive outcome of the procedure described above, by decision of the Certification Committee, entails the issue of the "Product Certificate" signed by the TC Director, which can be sent to the applicant company (TESSA) or filed in GEREM, and made available to it.

The issue of the certificate certifies that the product, following chemical-physical and organoleptic analyses, complies with the requirements set forth in the specific Production Regulations and, therefore, can be placed on the market as a DO wine.

From an accounting point of view, the batch/lot goes from wine suitable for DO to certified wine.

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6.7 Certification related decisions

In compliance with the UNI CEI EN ISO/IEC 17065 accreditation standard, TC has set up the Certification Committee (hereinafter, the CDC) appointed by the TC Director.

In conducting its activities, the CDC complies with the TC system procedures, namely the "Management of Committees and Commissions" (PG02) and the "Management of the activity of Review and activity of Certification Committee" (PO11). The members of the CDC pledge to comply with the commitments envisaged by TC regarding confidentiality and conflict of interest.

About inspections controls the main functions of the Committee are the following:

- deciding about conformities and non-conformities that emerged during control (inspection/documental);
- deciding as pertains to Non-Compliance not included in the Control Plan, defining severity, treatment, and corrective action.

For the certification of DO wines, the main tasks of the Committee include:

- issuing certificates of conformity/certificates of suitability, chemical non-suitability, organoleptic reviewability, and organoleptic non-suitability;
- deciding what actions must be taken with reference to any non-conformities, both of a general and particular nature, which may emerge from controls.

6.8 Issuance of Non-Conformity statements

The Non-Conformity provisions issued by the CDC are classified into two Levels:

- *SERIOUS Non-Conformities*: all the discrepancies that do not appear to be remedied and that irreparably affect the raw material and/or the product intended for DO or IG and its traceability. In this situation, TC, following a resolution of the Certification Committee within the time frame and in the manner provided for by the law, undertakes to notify any non-conformity to both the operator and the Supervisory Body in charge. In this case, it is possible to file an appeal against the decision.
- *MINOR Non-Conformities*: all discrepancies that can be resolved by amending and supplementing the documentation, or that are the result of simple errors.

The raw material and/or product and traceability are not irreparably damaged. Such Non-Conformities are resolved by the Certification Committee and notified to the Company within the time frame defined in the applicable legislation. TC proposes the method of resolving a Non-Conformity and ensures that the resolution action is implemented by the Company within the time frame set by the applicable legislation (also by means of a new inspection, if warranted). In this case, too, it is possible to file an appeal against any decision. In the absence of resolution, a MINOR Non-Conformity is high as SERIOUS and notified to the Supervisory Bodies.

Possible Non-Conformities regarding the certification of DO wine or situations of non-compliance with the requirements of the Production Regulations or the applicable statutory and regulatory requirements are divided into:

- **Chemical-physical unsuitability**: non-compliance resulting from failure to comply with the chemical-physical parameters of the product, which, in turn, puts the certification process on hold. The process can resume only after a second analysis has been performed, if requested by the interested party, with a positive outcome.

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- *Organoleptic review*: event that generates non-conformity assumptions concerning the product, resulting from failure to comply with sensory requirements, which, in turn, puts the certification process on hold. Following treatments intended to neutralize the causes that led to organoleptic review, the product can repeat the certification process in its entirety, starting from repeat analyses.
- *Organoleptic non-compliance*: event generating non-compliance of the product, deriving from failure to meet the sensory requirements of the product; as a result, the product cannot be certified. The sensory NC is also generated in case of a second Product review.

6.8.1 Revocation of Non-Compliance measures

MINOR and SERIOUS Non-Conformities can be revoked following the detection of compilation/evaluation errors by TC or by reporting on the part of the person received the resolution.

TC will promptly notify the recipient company of the measure to the competent bodies (in the case of NCG).

The revocation will be validated in advance by the CDC, by the same individuals who issued the original non-compliance notice.

7 CHANGES TO CERTIFICATION CONDITIONS

Changes affecting certification may concern:

- Production Regulations of DO and IG wines controlled by TC
- Control Plans of the aforementioned DO and IG wines
- national and EU legislation concerning the certification of wine products
- TC's Regulations, Procedures and Operating Instructions
- Fee Schedules
- operator's requests
- accreditation standards.

If changes are made to the reference documentation, TC informs the operator by written notice and/or publication on its website and, if necessary, the operator has the right to meet the new requirements within a term set by TC or to forgo certification.

8 USE OF PRODUCT CERTIFICATES

TC oversees production processes and makes sure that the certified products meet the requirements established by the Production Regulations, the Control Plans, and the applicable national and EU legislation by verifying that the operators requesting certification use the product certificates issued by TC in an appropriate and compliant manner.

The certificate issued authorizes the release of the product for consumption and can be reproduced for commercial purposes as long as such reproduction is complete and the contents are legible and not altered. The certificates identify the DO wine batch or lot and its holder, in accordance with the Ministerial Decree dated 12 March 2019.

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In the event that the product certificate is used by the operator in an inappropriate or misleading way in documents, publications, or in any other documentary support, TC will notify the violation to the ICQRF, which will take the appropriate measures and which might decide to publish the description of the abuses and improper uses of the certificate on the institutional website.

In relation to the use of the ACCREDIA stamp issued by the Accreditation Authority following accreditation, TC operates in compliance with the provisions contained in the "Regulations for the Use of the ACCREDIA Logo and Mark" (RG-09) which also regulates the use of the ACCREDIA stamp by users of accredited certification services (visite website <https://www.accredia.it>).

8.1 Reissue of Product Certificates

If errors/inaccuracies are found in the content of the certificate issued following internal inspections or a complaint by the operator, TC will prepare a new certificate, revised in the interested parts, issuing it with the same number as the previous one and followed by the mention "Bis" (with updated date), subjected to validation by the Certification Committee.

Only in the specific case the certificate will contain the words "this certificate cancels and replaces the previous one".

In the event of malfunction of the computer system or human error in the transfer of data or other reasons considered not to be serious and which do not affect the certification data, alternatively, a PEC or A/R communication shall be provided indicating the correct references.

9 TERMINATION, REDUCTION, SUSPENSION, OR REVOCATION OF CERTIFICATION

9.1 Reduction of Certification

The reduction of product certification occurs in the following cases:

- a) The product previously certified as DO and IG is downgraded (pursuant to Article 38 of Law no. 238 dated 12/12/2016 - so-called Consolidated law on grapevine and wine) in case of loss of the required chemical-physical and/or organoleptic properties or by choice of the holder of the specific batch of wine. In this case, the holder, after noting the operation in the Cellar Register, notifies the following data to the ODC:
 - quantity of downgraded product,
 - its location within the cellar,
 - for bulk DO wines only, details of the certificate of suitability or of the product certificate issued during the certification phase of the downgraded batch of wine,
 - for bottled DO wines only, assigned batch,
 - name of the DO or IG or other category of wine product (standard wine) with which the holder of the downgraded batch of wine intends to market the product on the condition that the latter possesses the requisites provided for by the Production Regulations.
- b) The mixing of two or more DO wines with different IG wines entails the loss of the right to the original geographical reference for the product, which can still be classified as IG wine if it has the characteristics envisaged by the specific Production Regulations.

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9.2 Revocation of Certification

The revocation of product certification occurs following the mixing between a batch of wine destined to become table wine and one of certified wine. This operation involves the loss of the previously-issued certification. In this case, however, the holder of the batch of wine in question can request a new certification for the batch of wine following the aforementioned mixing.

The suspension of an operator, for various reasons and causes, can take place on the recommendation of the competent Authority.

10 SAFEGUARDING IMPARTIALITY

In compliance with the UNI CEI EN ISO/IEC 17065 accreditation standard, TC has set up a representative body for the interested parties, namely the Impartiality Safeguard Committee or CSI.

The Committee is made up of representatives of the following interested parties:

- TC's Customers/Customers of Companies certified by TC (Producers; Processors; Distributors);
- Consumers/Representatives of Non-Governmental Organisations;
- Conformity assessment experts;
- Government Bodies/Regulatory Bodies.

At the request of TC, the interested parties will appoint a representative which after a positive verification of the entry requirements, will be included in the List of CSI Members.

The CSI is responsible for safeguarding the impartiality of TC in relation to the activities it carries out as a control body of DOP Delle Venezie and IGT Trevenezie in a regulated context.

In detail, the CSI is tasked with:

- countering any tendency by which commercial or other aspects may prevent a congruent and objective performance of the certification activities;
- assisting TC in the development of general policies for its work;
- providing suggestions on aspects that may affect trust in certification, including transparency and public perception;
- conducting a review at least annually regarding the impartiality of the TC's CDC inspection activities and decisions.

The CSI has the right to undertake independent actions (for example, inform the authorities, accreditation bodies, etc.) if TC does not take into account the recommendations provided in terms of safeguarding impartiality. In taking these actions, the CSI must comply with the confidentiality requirements relating to customers and TC.

In the event that the opinions expressed by the Committee for the Safeguard of Impartiality are in conflict with TC procedures or with the mandatory requirements, TC may not follow the guidance received by documenting the reasons for its decision and keeping the relevant records, informing the authorities, the accreditation body and interested parties.

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11 COMPLAINTS AND APPEALS

In compliance with UNI CEI EN ISO/IEC 17065 accreditation standards, TC has adopted an operational procedure for the management of complaints/appeals submitted by parties involved in the certification activities.

11.1 Complaints

All those who intend to file a complaint must submit the request exclusively in writing by filling out the form on the TC website (www.triveneta.wine) titled "Complaint" (MO035). The form, completed in its entirety, must be sent to the Administrative Office or sent by standard email (info@triveneta.wine) or certified email (PEC) (comunicazioni@pec.triveneta.wine).

11.1.1 Special cases

The operator who deems the values provided in the Test Report included in the Product Certificate to be incorrect can submit a Complaint to TC with the documentation and methods described above, in particular, the form must contain a full description of the reason and be accompanied by a test report issued by an accredited laboratory.

The request can be submitted within a maximum period of five months from the issue of the certificate.

If the data is confirmed by the Laboratory that performed the analysis, TC appoints a third Laboratory to perform the analysis on the reserve sample. If the new results confirm the data of the certificate, the company will be informed of this result which is final. The cost incurred will be charged to the applicant company.

Otherwise TC will issue a new product certificate (BIS certificate) and will bear the cost of the second analysis.

11.2 Appeals

In compliance with UNI EN CEI ISO/IEC 17065 accreditation standards, TC has established an Appeals Review Body (ODR) whose task is to evaluate any revocation requests submitted by subjects controlled by TC against its decisions regarding them.

The ODR is made up of three members overseeing legal, regulatory, and technical matters. The members are appointed according to the criteria of impartiality as well as experience and independence vis-à-vis by the Board of Directors concerning TC's control/certification.

The assignment lasts three years and is renewable.

In the event that no members are appointed, the ODR can be made up of expert technicians without the right to vote.

All the members of the ODR are required at the preliminary stage to declare that they are not part of the applicant company and to keep confidential the information of which they become aware in the course of their activities, by signing a declaration as signed in the Code of Ethics.

The decisions of the ODR are unquestionable and cannot be appealed within TC unless it proves that the interpretation and execution of the ODR's activities is in conflict with the rules and procedures applicable to the Appeal and is not relevant to the subject matter of the same.

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11.2.1 Appeal against the negative result of chemical-physical analysis of a wine sample suitable for DO labelling

As a result of Article 6 of the Ministerial Decree dated 12.03.2019 (paragraphs 4, 5, and 6), the operator can file an appeal in the event that the chemical-physical analysis of the wine sample collected for certification purposes is not successful.

The deadline for submitting the appeal is *seven days* from the date of receipt of the communication of the outcome of the test by TC.

The notification must be submitted via certified email to the Administrative Office of the ODC providing the references of the decision against which the appeal is being filed.

Upon receipt of the request, TC sends the sample, consisting of an aliquot of the sample collected from among those stored to a second laboratory authorized by MASAF and identified by TC in the List of Outsourced Laboratories, which is different from the laboratory that performed the initial analyses.

In case of confirmation of the negative result by the second laboratory, TC informs the company that the sample is not suitable via a dedicated form within three days from the date of receipt of the analyses.

In the event of a positive outcome of the analysis, the sample in question can be submitted for certification.

The costs of the analyses are borne by the appellant.

This type of Appeal is not the responsibility of the Appeals Review Body.

11.2.2 Appeal against the negative result of the organoleptic analysis by the Tasting Commission

If a wine sample, suitable for chemical analysis can be “reviewed” for the issuance of the opinion of TC’s Tasting Commission, the interested party, after all the sector procedures have been completed, may request a new sampling in order to receive a final opinion, within the maximum term of sixty days from the notification that the sample can undergo review. In this case, the chemical-physical analysis must also be repeated. In the event of a new non-compliant judgment, the sample is to be considered as “unsuitable” wine.

Pursuant to Article 11 of the Ministerial Decree dated 12.03.2019, an operator can appeal against the judgment of “unsuitability” issued by TC’s Tasting Commission.

The Appeal must be submitted by the interested party to the Appeal Commission for DO wines, located at the Administrative Office of the National Committee for DOP and IGP wines - Ministry of Agricultural, Food, and Forestry Policies (Department of Competitive, Agri-food Quality, Horse Racing, and Fishing Policies - General Directorate for the Promotion of Agri-food Quality and Horse Racing - PQAI IV Office, via XX Settembre, 20 - 00187 Rome - Certified email (PEC) saq4@pec. politicheagricole.it). The Appeal, to be drawn up in accordance with the form referred to in Annex 4 of the Ministerial Decree dated 12.03.2019, is filed at TC which, within **seven days** of receipt, sends it, at the expense of the Appellant, to the Appeals Commission together with a sample of the wine deemed to be “unsuitable”, set aside and kept at the aforementioned Control Body. TC also submits an electronic copy of the Appeal, along with the relative documentation of “unsuitability”, the chemical-physical analysis certificate, and the relevant address.

This type of Appeal is not under the purview of the Appeals Review Body.

11.2.3 Appeal against the decisions of the Certification Committee

Under penalty of inadmissibility, the Appeal against the opinion of the Certification Committee must be submitted by the Appellant with the time frame and methods defined below, and clearly state the reasons for the objections to the opinion.

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Appeals accepted on SERIOUS Non-Conformities are promptly notified to the ICQRF in advance.

In the event that the Appeal concerns an objection over a SERIOUS non-compliance, TC will forward, via certified email (PEC), a copy of the Appeal filed by the Appellant together with the decision issued by the ODR to the competent ICQRF and the bodies (Veneto Region, Autonomous Region of Friuli Venezia Giulia and Province of Trento).

In case of acceptance of the Appeal, TC notifies the decision taken to the Certification Committee.

Within five days of the conclusion of the procedure, TC will forward to the competent bodies (ICQRF, Regions, and Provinces) the decision taken by the Certification Committee together with a copy of the supporting documents or the Appeal filed by the Appellant.

11.2.4 Application and Appeal procedure

Appeals from the supervised subjects against decisions adopted by TC regarding them are submitted to the attention of the President of the ODR as follows:

- using form “MO036 - Appeal submission” filled out and sent by certified email (comunicazioni@pec.triveneta.wine) or by registered letter to the TC office (Piazza del Popolo nr. 52, 33078 San Vito al Tagliamento - PN), paying particular attention to the fields bearing under penalty of inadmissibility of the Appeal. The aforementioned form can be downloaded from the TC website or requested from the TC headquarters.

The Appeal must be filed within a maximum of 30 days from the date of communication of the decision that the Appellant intends to challenge.

TC will send the ODR its counter-arguments to the Appeal no later than five working days from the date of submission of the Appeal.

With reference to the Non-conformity object of the Appeal, TC will provide for the suspension of the deadlines for the resolution until a ruling by the Deciding Appeals Body.

The ODR shall, within five working days of receipt of TC's rejoinders, in the case of a request for a hearing received from at least one of the parties, or from the Body itself, fix the hearing and notify the parties by PEC (certified email).

During the hearing, the parties have the right to be represented by an Attorney-in-Fact who has been specifically conferred proxy powers in this regard, bearing the personal details of both the Attorney-in-Fact and the Principal. The proxy must also bear a date and be signed by the Principal and be accompanied by copies of the ID documents of both Attorney-in-Fact and Principal.

Minutes of the hearing are drawn up in summary form.

Under no circumstances shall TC staff, as the subject involved in the hearing before the ODR, be able to provide the Appellant with opinions and information about the accuracy of the Appeal.

The ODR decides on the items set in the Appeal within **thirty days** from its filing (date of transmission to the ODC).

The decision taken by the ODR will be notified to the parties at their respective certified email addresses.

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11.2.5 Appeal outcome

In the event that the Appeal is declared admissible in advance, the ODR at the end of the procedure will issue a debit note in relation to the activity carried out, the amount of which will be charged to the losing party.

In the case of a decision in favour of the applicant, TC will call off the contested NC and, where appropriate, a resolution of adaptation.

11.2.6 Inadmissibility

In the case of declared inadmissibility of the Appeal by means of notification of the decision made by the ODR, the latter will issue a charge note to the Appellant, in accordance with the provisions of the Fee Scheduled contained in the Control Plans, in addition to the sum accounting as ODR operation fees, if any is due by law.

The inadmissibility will always be declared in the event that an appellant party has failed to pay the costs of the previous actions, which he ascribes to him.

11.2.7 Total liability for loss of Appeal

In the event of a decision on the merits, the ODR will, within **ten working days** from the date of the final opinion, issue a charge note to the unsuccessful party for fees and expenses due to each ODR member, according to the Fee Schedule contained in the related Control Plans, in addition to a sum accounting as ODR operation fees, if any is due by law.

11.2.8 Partial liability for loss of Appeal

In the event that neither party wins the Appeal, the ODR will define the amount to be levied against each party, and issue debit notes for fees and expenses due to each member of the ODR within ten working days from the date of issuance of the decision, within the parameters defined above.

11.2.9 Disputes

Any disputes that may arise between the parties shall be under the exclusive jurisdiction of the Court of Pordenone.

12 RIGHTS AND OBLIGATIONS OF TRIVENETA

- TC undertakes to verify, with professionalism and competence, compliance with the requirements of the applicable Control Plan.
- TC assumes no obligation regarding the positive outcome of the compliance inspection. Any consultancy activity in the implementation and/or maintenance by the controlled operator of the requirements subject to compliance control is expressly excluded.
- In compliance with applicable legislation, TC monitors the CSI with complete impartiality.
- TC services are available to any operator whose activity concerns the supply chain in which TC operates.
- TC undertakes to apply the fee schedule set by the authorization Ministerial Decree, guaranteeing fairness and uniform application.

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- TC undertakes to notify the Operators concerned about any changes to conditions and terms previously provided.
- TC reserves the right to notify to its CSI, as well as to ACCREDIA and MASAF any information, if it is officially informed by means of official documents, concerning the involvement of controlled Operators in judicial proceedings on product liability or statutory violations, as it pertains to finished products and/or services provided, or, in any case relating, to the product being inspected.
- With regard to access to the premises by ACCREDIA, in the context of control activities carried out annually by the latter on TC, the observers will only be able to evaluate TC's activities.
- Moreover, if the accreditation activities provide for the access of ACCREDIA operators to the inspected companies, ACCREDIA must first secure the authorization of any such companies.

13 OBLIGATIONS OF OPERATORS

The Operator undertakes:

- to comply at all times with all statutory and regulatory requirements applicable to its production activities,
- to always meet the certification requirements in application of the Regulations, Control Plans, and applicable Provisions, including the implementation of appropriate changes when these are notified by TC,
- if the certification applies to ongoing production, to ensure that the certified product continues to meet the product requirements,
- to adopt all the necessary provisions in order to:
 - allow unconditional access to TC staff for control activities and make available for review any documentation and records as well as grant access to relevant equipment, sites, areas, personnel, and any customer subcontractors,
 - allow unconditional access to ICQRF and Accredia staff, who may support TC staff during evaluation and surveillance activities
 - ensure the participation of observers, if applicable,
- make declarations on the certification consistent with the field of application of the certification itself, as it pertains to its own customers so as not to mislead them concerning the certification issued by Triveneta Certificazioni S.r.l., using the certification exclusively for the product for which it was issued
- not use its product certification in a manner that would bring TC into disrepute and not make any statements regarding their product certification that TC may consider misleading or unauthorized,
- in the event of any suspension, revocation, or expiration of the certification, stop using any advertising material containing any reference to certification and take any action as required by the certification scheme and any other measures required,
- in case it provides a copy of its certification documents to third parties, reproduce them in their entirety and as specified in the certification scheme (product certificate),
- comply with any requirements that may be prescribed by the certification scheme and information relating to the product,

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- keep a record of all Complaints submitted by its customers concerning compliance with certification requirements and make these records available to TC when requested, and:
 - take appropriate action with respect to such Complaints and any defects found in products that affect compliance with certification requirements,
 - document any actions undertaken,
- inform TC, without delay, of changes that may affect its ability to meet the certification requirements:
 - transfer of the headquarters of a plant for vinification and/or bottling outside the production area envisaged by the specific production regulations;
 - sale/rental of a winemaking and/or bottling plant;
 - discrepancy between the quantities of bulk/bottled DO and IG wines stored in the cellar, with confirmation of the relative documents and cellar records, and those provided to the ODC;
 - discrepancies between the chemical-physical and/or organoleptic parameters of the bottled DO-certified wines and those listed in the official analysis report referred to in the Ministerial Decree dated 12 March 2019.

Finally, the operator must notify TC of any changes relating to:

- the introduction of new activities/products/services that have an impact on control activities;
- the judicial, commercial, organizational state or the state related to the property or the Legal Representative;
- contact addresses and sites.

The control activity only concerns compliance with the requirements of the Control Plan and, therefore, does not constitute a certification of compliance with the mandatory requirements. As a result, a positive outcome does not relieve the Supervised Operator from any legal requirement.

The Operator undertakes to notify TC if it becomes involved in legal proceedings resulting from violations of the laws applicable to the manufactured product.

The Operator must send to TC the reports relating to inspections to the Control Bodies (ICQRF, NAS, etc.), if relevant to the field of application of TC and also deliver such documentation (about measures in the last 12 months if any) to the inspector in the event of control.

14 CONFIDENTIALITY

TC undertakes to protect and guarantee confidentiality towards third parties, as prescribed by current legislation and by the reference standards, as it pertains to the documentation and information in its possession concerning its relations with the Operator concerned.

If requests for information and data are received by the judicial authority, TC will follow up on these requests, informing the Operator concerned in this regard.

This area also includes the information received by TC, information not coming from the companies themselves such as, for example, the information provided by Protection Consortium.

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15 HEALTH & SAFETY

The operator must provide TC inspectors with detailed information on the specific risks existing in the environments in which they will operate and on the prevention and emergency measures that are applicable to its activities (including the availability and use of PPE, if any), in order to allow the inspections to be carried out in safety.

16 ECONOMIC ASPECTS

The activities carried out by Triveneta Certificazioni S.r.l. are financed by fees paid by customers on the basis of the type of wine product and the supply chain segment to be monitored. The Control Plans and the fee schedule contained therein, published on the website of the Certification Body, are approved by MASAF, pursuant to Ministerial Decree No. 7552 dated 2 August 2018 and its amendments and additions.

TC's sources of funding derive from:

- application of the Fee Schedule for:
 - grape production
 - grape vinification
 - wine bottling
 - grapes/wines intermediaries
 - wine sampling
 - wine certification
- sale of Seals
- funding from shareholders.

Any Operators requesting certifications from TC undertake to make any payments due upon submission of invoices by TC, as detailed thereon.

16.1 Invoicing to supply chain operators

For the purpose of invoicing for Winegrowers and grape Intermediaries, issued annually by 31/07, TC acquires data coming from the reporting of grapes from the following applications:

- AVEPA application for the Veneto Region
- SIAN application for the Autonomous Region of Friuli Venezia Giulia
- SIAP application for the Autonomous Province of Trento.

For Winegrowers the fee includes:

- Quantity of grapes charged multiplied by the flat fee foreseen by the Fee Schedule for Winegrowers.
Any grapes in storage are invoiced.

For Winegrowers not associated with wineries, invoices are issued to individuals.

For Winegrowers associated with authorized wineries, invoices are issued to the relevant cooperative winery.

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For grape Intermediaries the fee includes:

- Quantity of grapes sold multiplied by the flat fee foreseen by the Fee Schedule for the Intermediary category.

For Winemakers the fee includes:

- Quantity of wine sent for certification multiplied by the flat fee foreseen by the Fee Schedule for Winemakers – DO Delle Venezie
- Quantity of wine stated for the unit quota multiply by the fee foreseen by the Fee Schedule for the Winemakers - IG Trevenezie.

For wine Intermediaries the fee includes:

- Quantity of wine sold multiplied by the flat fee foreseen by the Fee Schedule for Intermediaries, taking into account that invoicing is done annually, by 28/02, extrapolating the intermediation data to which the relevant fee gathered from the GEREM/TESSA systems are applied.

Invoicing for operators requesting certification and for bottlers is done at the end of the month; the production data to the relevant fee is applied are gathered from:

- the GEREM system
- the TESSA system

Billing for applicants of wine DO certification includes:

- Quantity of wine for which certification is requested multiplied by the flat fee foreseen by the Fee Schedule for the relevant category (fee for Tasting Commission)
- Laboratory analysis fee
- Fee for sampling to be submitted to analysis and to the Tasting Commission
- Winemaker fee.

In the case of certification process results non-conformity with the first sample submission due to:

- Physical chemical non-suitability
- sensory reviewability,

net of the fees due for sampling, analysis fee and the fee for the tasting commission, the winemaker's quota is always applied (identified in the administrative documentation as "certification quota").

In the case of a second presentation of the same sample, the winemaker's quota shall not be charged regardless of the result of the test.

Billing for DO wine Bottlers includes:

- Quantity of wine bottled multiplied by the flat fee foreseen by the Fee Schedule for Bottlers.
- The **€ 0.015** fee is due for the Seals purchased by them.

The invoicing for IG Bottlers includes:

- Quantity of wine bottled for the unit quota provided for in the tariff.

For foreign Bottlers, the cost of transport for the delivery of Seals is billed at the cost actually incurred in.

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Companies selling directly to the final consumer are treated as bottlers. The bottler fees is applied to the quantities of wine put in the market for direct sale.

17 PRIVACY POLICY

As stated in the "STANDARD CUSTOMER PRIVACY POLICY" posted on its website, TC informs all operators subject to the DO and IG control system whose personal data are protected pursuant to Regulation 679/2016 ("GDPR"), or their representatives, that any of their personal data (biographical data, email address, telephone number, and ID card) provided by them at the time of role assignment or when filling in the forms, will be used for the following purposes:

- (a) the implementation of the contractual relationship concerning the monitoring of the Controlled Denominations of Origin and Typical Geographic Indication;
- (b) related to legal obligations, legal and contractual fulfilments deriving from (including tax or accounting purposes), regulations, national and Community rules and administrative authorities dispositions;
- (c) the management and carrying out of requests through the filling out of the forms (Complaint, Appeal, communication regarding bottling/packaging/unpacking, request/delegation for the withdrawal/surrender of DOP labels, notification of wine mixing, notification of use of sweeteners, self-declaration on the use of sweeteners, request for sampling for chemical-physical and organoleptic tests and in-cellar handling, substitutive declaration of complaint concerning grapes and wines, request to submit to the Control Plan, etc.).

The legal basis of the processing carried out for the purposes referred to in letters a) and c) is that provided by art. 6, para. 1, letter b) of European Regulation 679/2016, that is "the processing itself is necessary for the execution of a contract to which the data subject is a party or for the execution of pre-contractual measures taken at the request of the same". The processing carried out for the purpose referred to in letter b) is based on legal obligations to which the Company is subject pursuant to article 6, para. 1 letter c) of the Regulation.

The data are managed by the administrative staff by electronic and paper means, acting as Data Processor, also according to automated methods that are deemed to be instrumental to the pursuit of the aforementioned purposes, and by third parties appropriately appointed as external Data Processors.

Customer data are not transferred outside the European Economic Area ("EEA"). If this should happen in the future, the Data Controller will provide adequate guarantees and safeguards for the processing of data outside the EEA, in accordance with the provisions of the GDPR.

The data of the subjects of the supply chain may be shared:

- for statistical-economic purposes to Consortia for the Protection of Denominations which, in order to exercise their function, request data relating to the economic activities of operators (production volumes, also on an individual basis);
- for the purposes indicated above and, in any case, connected to due diligence carried out to monitor the accurate work of Triveneta Certificazioni S.r.l., and to other public Authorities, for their fulfillment of statutory requirements (Accreditation Body, Central Inspectorate for the

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control of the quality of agri-food products (ICQRF), Ministry of Agriculture, Food Sovereignty and Forestry, Regions and competent Chambers of Commerce);

- to companies that provide tax, accounting, and administrative consultancy services.

Data entered in the relevant records may be made public in the cases provided for by the law, in press articles, or for information purposes, in which Triveneta Certificazioni S.r.l. discloses the names of some customers without prejudice to their right to object.

Customer data are kept for the time strictly necessary to pursue the purposes described above and, in any case, for the entire duration of the service, taking into account any additional time for the management of disputes/legal proceedings/accounting documentation, but not exceeding ten years.

The Data Controller is Triveneta Certificazioni S.r.l., with registered office in Piazza del Popolo nr. 52, 33078 San Vito al Tagliamento (PN). Data subjects can obtain the updated list of Data Processors by writing to Data Controller.

For further information on the operations indicated and, in particular, to access, delete, anonymize, or block data processed in violation of the law, request data updates, amendments, integration, and portability, to object to their use, and to exercise other rights provided for by Articles 15 et seq. of the Regulations, it is possible to submit a request to Triveneta Certificazioni S.r.l. or contact the Manager at privacy@triveneta.wine email address. Operators who determine that their rights have been violated can contact the competent Supervisory authority, pursuant to Art. 77 of the GDPR, without prejudice to the possibility of directly contacting the judicial authority.