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Noble Wine Across Borders: Comparative Regulatory Terminology and Its Implications for Wine Classification Systems in Brazil, Spain, and Italy

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Abstract

The terms *vinho nobre* (Portuguese), *vino noble* (Spanish), and *vino nobile* (Italian) illustrate how cognate vocabulary can encode different regulatory meanings in the wine sector. Brazilian *vinho nobre* is a technical classification tied to alcohol strength and the exclusive use of *Vitis vinifera* (14.1%–16% ABV) under law Instrução Normativa No. 14/2018. Spanish *vino noble* denotes an aging-based category requiring at least 18 months of maturation under Spain's traditional aging terminology framework. Italian *Vino nobile di Montepulciano* is a protected territorial denomination (DOCG) with minimum Sangiovese content and mandatory aging requirements.

This paper compares these three frameworks as distinct quality signals, examines the institutional and historical roots of divergence, and analyzes legal and trade implications under TRIPS and the EU–Mercosur agreement. It documents a triangular asymmetry—technical standard (Brazil), aging category (Spain), territorial GI (Italy)—and propose policy measures (terminology equivalence annexes, labeling differentiation, and international terminology standards) to reduce consumer confusion and trade friction.

Keywords: vinho nobre; vino noble; vino nobile; geographical indications; wine regulation; trade policy; information asymmetry; TRIPS; EU–Mercosur

1. Introduction

Wine markets are marked by information asymmetry: consumers often cannot assess intrinsic quality before purchase and therefore rely on extrinsic signals such as price, expert ratings, labels, and institutional classifications (Akerlof, 1970; Spence, 1973; Lockshin & Corsi, 2012). Regulatory terminology functions as one such institutional signal, but identical or cognate words may have divergent legal content across jurisdictions. This paper examines the cognate family *vinho nobre* / *vino noble* / *vino nobile* to explore how lexical similarity can mask deep differences in regulatory logic and economic function.

Three jurisdictions are compared: Brazil (*vinho nobre* under MAPA IN 14/2018), Spain (*vino noble* as a traditional aging mention under national labelling rules implementing EU wine law, notably Real Decreto 1363/2011), and Italy (*Vino nobile* di Montepulciano DOCG). The comparison highlights three different signaling mechanisms: (1) a measurable, chemistry-based technical standard (Brazil), (2) a process/time-based aging category (Spain), and (3) a place-based legally protected GI with collective governance (Italy).

The paper asks: (i) How do regulatory definitions differ? (ii) What institutional/historical factors explain divergence? (iii) What are the legal and economic implications for GI protection and cross-border trade (notably EU–Mercosur)? This contribution bridges wine economics (quality signaling), GI governance (legal protection), and terminology studies (cross-linguistic/translation divergence), filling a gap where cognate regulatory terms have not been systematically compared.

2. Literature Review

2.1 Wine Classification and Quality Signaling

Wine quality signaling literature shows that institutional markers—GIs, aging categories, and certifications—serve as costly-to-replicate signals that alleviate information asymmetry (Spence, 1973; Akerlof, 1970). GIs can raise average producer quality by reducing free-riding and encouraging investment, although effectiveness depends on governance structure and

GI strictness (Guareschi et al., 2023; Menapace & Moschini, 2024). Price and expert ratings also function as signals but have limitations (Anderson & Pinilla, 2018).

2.2 Geographical Indications and Trade Protection

EU GI law embeds quality claims in territorial legal structures (PDO/PGI), and TRIPS Article 22 defines GIs as indications linking goods to territory-based quality or reputation (World Trade Organization [WTO], 1994). Trade agreements (e.g., EU–Mercosur) increasingly list protected GIs and set rules for coexistence and transition for prior uses (European Commission, 2024; Velli & Pantaleo, 2023). Literature notes complexities when protected names collide with generic or technically defined terms elsewhere (Josling, 2006; Tiefenbacher & Townsend, 2020).

2.3 Wine Terminology, Translation, and Cultural Variation

Wine language research highlights strong cross-cultural variation in descriptors and the difficulty of mapping terms across languages (Noble et al., 1987; Creed, 2026). Terminology projects and bilingual term banks improve precision for sensory vocabulary, but regulatory legal terms need dedicated comparative analysis (Balbuena Torezano & Álvarez Jurado, 2023).

3. Methodology

3.1 Research Design

This is a qualitative comparative regulatory analysis (small-N, theory-driven). It compares statutory and disciplinary texts, regulatory guidance, consortium documents, and trade agreement provisions to map legal meanings and enforcement mechanisms. The aim is conceptual precision rather than causal identification.

3.2 Case Selection

Brazil represents a New World, technical-standards approach (IN 14/2018). Spain represents an EU member with aging-category regulation implemented through national

labelling rules that develop EU wine law, notably Real Decreto 1363/2011 on the labelling and presentation of wine products. Italy represents a classic Old World territorial GI (*Vino nobile* di Montepulciano DOCG). These cases capture the typology: technical standard, aging category, territorial GI.

3.3 Data Sources

Primary legal texts: Brazil MAPA IN 14/2018; Spain Real Decreto 1363/2011 on labelling and presentation of wine products and Ley 6/2015 on designations of origin and geographical indications; Italian DOC/DOCG disciplinary texts and ministerial decrees; EU regulations (e.g., Regulation 1308/2013) and the EU–Mercosur agreement annexes; and EU databases on protected names and traditional terms (eAmbrosia for GIs and traditional wine terms). Secondary sources: academic literature on GIs, trade policy analyses, consortium communications. All legal and policy sources were consulted in original language where available and in official translations when present.

For Spain, because the domestic consolidated text no longer lists all traditional mentions in detail, I used the EU eAmbrosia database (which replaced E-Bacchus) to retrieve the official ‘Traditional Term Details’ for the Spanish term *noble* and to cross-check ageing requirements for standard wines and for Málaga liqueur wines.

3.4 Analytical Framework

Analysis proceeds along five dimensions: (1) legal definition specificity, (2) technical requirements (ABV, aging, grape composition, yields), (3) enforcement mechanisms, (4) geographical linkage/GI status, and (5) historical/institutional context. Terminological mapping (Portuguese–Spanish–Italian) is applied to show semantic divergence and regulatory mapping.

4. Brazil: *Vinho nobre* as Technical Standard

Brazil’s Instrução Normativa No. 14, de 23 de fevereiro de 2018, establishes *vinho nobre* as a national classification characterized chiefly by grape species (*Vitis vinifera* only) and

alcoholic strength (14.1%–16% ABV) (Brasil, 2018). Brazil’s ministry presentation links this category to production in regions where viticultural techniques such as double pruning and winter harvesting have enabled grapes to reach higher natural sugar and alcohol levels, especially in the Southeast and in the Mantiqueira area, while tropical viticulture in the São Francisco Valley can also produce high-quality wines under intense solar radiation and two harvest cycles per year. Subcategories (Reservado, Reserva, Gran Reserva) layer aging requirements, but the central axis remains ABV and varietal purity. The classification is national (not territory-specific) and enforcement is via MAPA inspections and laboratory verification. This regulatory logic emphasizes measurable, laboratory-verifiable attributes as the basis of a premium category (Brasil, 2018).

5. Spain: *Vino noble* as Aging Category

In Spain, traditional mentions such as *vino noble*, *vino añejo* and *vino viejo* are regulated as labelling terms under national rules that implement EU wine law, in particular Real Decreto 1363/2011 on the labelling, presentation and identification of certain wine products (Ministerio de Medio Ambiente, y Medio Rural y Marino, 2011). Within this framework, *vino noble* sits below *vino añejo* and **vino viejo**: the traditional mentions distinguish *noble* as the shorter ageing category (18 months), while *añejo* and *viejo* denote progressively longer maturation (24 and 36 months, respectively) and more oxidative profiles, making the term part of a tiered quality language rather than a geographical denomination. These ageing thresholds are confirmed at EU level in the eAmbrosia register, where the traditional term ‘*noble*’ is defined for Spain as wines aged at least eighteen months in oak barrels of up to 600 litres or in bottle, and for Málaga liqueur wines as aged between two and three years. The term is process/time-based and can appear within DO frameworks, but it does not, by itself, constitute a territorial GI. Economically, the Spanish term signals investment in maturation (inventory costs and style decisions) rather than place-based reputation.

6. Italy: *Vino nobile di Montepulciano* as Protected Territorial Denomination

Vino nobile di Montepulciano DOCG is a territorially-rooted GI with deep historical provenance (references to the wine date to the 16th century), DOC status in the 1960s and

DOCG in 1980, disciplinary rules specifying geographic boundaries, minimum Sangiovese (Prugnolo Gentile) percentages, aging (2–3 years), yield limits, and mandatory tasting/inspection processes (Consorzio del *Vino nobile* di Montepulciano, n.d.; Ministero dello Sviluppo Economico, 2023). Recent updates have introduced “Pievi” sub-zones to increase terroir differentiation (Consorzio del *Vino nobile* di Montepulciano, 2023). This is fully aligned with TRIPS Article 22’s territorial quality nexus.

7. Comparative Analysis

Table 1

Core Dimensions of Comparison for “Noble Wine” Terminology

Dimension	Brazil: <i>Vinho nobre</i>	Spain: <i>Vino noble</i>	Italy: <i>Vino nobile</i> di Montepulciano
Core logic	ABV/varietal technical standard	Aging/time-based category	Territorial GI with varietal and aging discipline
ABV requirement	Statutory 14.1%–16%	No ABV tied to term	DOCG minimums set by disciplinary
Grape requirement	<i>Vitis vinifera</i> only	Term-neutral (depends on DO)	Minimum 70% Sangiovese (Prugnolo Gentile)
Geographical link	None (national standard)	Contextual (DO-level)	Strict commune-level delimitation (Montepulciano)
Regulatory type	National technical classification	Aging category within DO framework	DOCG/PDO GI
Enforcement	MAPA and laboratory analysis	DO councils and inspections	Consortium, ICQRF, and DOCG seal
GI status under TRIPS	Not a GI (no territory)	Not a GI (aging category)	Protected GI (territory-linked)
Historical origin	2018 (modern regulation)	2011 (RD 1363/2011 labelling rules)	16th century; DOC 1966; DOCG 1980

Note. ABV = alcohol by volume; DO = Denominación de Origen; DOCG = Denominazione di Origine Controllata e Garantita; GI = geographical indication; PDO = Protected Designation of Origin. Sources: Brasil (2018); Ministerio de Medio Ambiente, y Medio Rural y Marino (2011); España, Cortes Generales (2015); Consorzio del *Vino nobile* di Montepulciano (n.d.); Ministero dello Sviluppo Economico (2023); WTO (1994).

These mappings show that identical lexical roots—derived from Latin *nobilis*—function as different institutional mechanisms for signaling quality.

8. Discussion

8.1 Information Asymmetry and Consumer Interpretation

Because labels are condensed information devices, lexical similarity across jurisdictions risks consumer misinterpretation. A consumer encountering *vinho nobre*, *vino noble*, or *vino nobile* may assume comparable quality commitments despite differing legal content. Misinterpretation can reduce informational efficiency and therefore generate transaction costs in cross-border markets (Akerlof, 1970; Spence, 1973). Empirical work on label effects suggests that such confusion could materially affect purchase decisions and willingness to pay (Lockshin & Corsi, 2012).

8.2 GI Protection and TRIPS Asymmetry

Under TRIPS Article 22(1)¹, a GI identifies goods as originating in a territory where quality, reputation, or other characteristic is essentially attributable to geographical origin (World Trade Organization [WTO], 1994). Italian *Vino nobile* di Montepulciano satisfies this definition and is protected as DOCG; Brazilian *vinho nobre* does not because it lacks a territorial link and functions as a national technical classification (Brasil, 2018). The EU–Mercosur agreement lists many EU GIs for protection in Mercosur parties (including Italian DOCG names) and sets mechanisms for coexistence and transition for prior uses; this structure produces asymmetry where an Old World GI is protected while a similar-sounding New World technical term receives no corresponding protection (European Commission, 2024; Velli & Pantaleo, 2023).

8.3 Trade Governance and Policy Friction

¹ **TRIPS Article 22(1)** is the core World Trade Organization definition of a *geographical indication* (GI): it protects names/signs that identify a good as originating in a specific place when a quality, reputation, or other characteristic of that good is essentially attributable to that geographical origin.

The EU–Mercosur wine annex allows certain Mercosur wine terms to be used within the EU when defined domestically but requires notification and technical dossiers for additional terms; it also protects listed EU GIs from genericization (European Commission, 2024). The triangular asymmetry (Italy protected GI vs. Brazil technical standard vs. Spain aging category) raises negotiation issues: Should Brazil’s *vinho nobre* be recognized, restricted, or allowed under labeling differentiation? Precedents (e.g., Prosecco, Parmigiano/Parmesão) show varied outcomes: coexistence with labeling conditions, phase-outs, or protection depending on historical prior use and negotiation outcomes (Velli & Pantaleo, 2023).

To maximize the practical value of these policy options, it is important to specify who benefits from each instrument. An ISO specification would primarily benefit translators, regulators, trade negotiators, and customs officials by creating a shared vocabulary that reduces classification errors and speeds up market access. Trade annexes and terminology equivalence appendices would benefit exporters and importers by lowering uncertainty about whether a term is a GI-protected name, an aging category, or a technical standard, while also benefiting regulators by giving them a clearer basis for enforcement. Labeling differentiation would mainly benefit consumers and compliant producers by reducing misinterpretation and preventing misleading cross-border equivalence claims, especially where cognate terms look similar but carry different legal meanings.

9. Policy Recommendations

Three interrelated policy measures can reduce trade friction and improve consumer transparency, but each does so for a different set of actors: regulators and negotiators, market intermediaries, and consumers/producers.

9.1 Terminology Equivalence Appendices in Trade Agreements

Include a technical annex that classifies terms into GI-protected names, aging categories, technical standards, and marketing/generic descriptors, with equivalence tables and a notification/fast-track process for technical standards. This clarifies legal treatment and reduces surprise during market access.

9.2 Labeling Differentiation and Consumer Information

Mandate clear origin and regulatory-category labeling when linguistically adjacent terms cross borders (e.g., “*Vinho nobre* — Brazil (alcohol-based classification)” or “*Vino nobile* di Montepulciano DOCG — Italy (PDO)”), and encourage QR-coded links to official definitions. Such modest disclosure requirements reduce consumer confusion at low cost.

9.3 International Terminology Standards

Propose an ISO technical specification (via ISO/TC 34/SC 19) that distinguishes GI terms, aging categories, technical product classifications, and marketing descriptors. This standard would aid translators, regulators, and trade negotiators.

10. Conclusions

Cognate wine terms—*vinho nobre*, *vino noble*, and *vino nobile*—expose how identical lexical roots can function as different regulatory institutions: a technical ABV-based standard (Brazil), an aging category (Spain), and a territorially protected GI (Italy). For wine economics and policy, terminology is not merely linguistic detail; it constitutes an institutional signal that matters for information asymmetry, price formation, and international legal protection. Terminological clarity through trade annexes, labeling differentiation, and international terminology standards would reduce trade friction and improve market transparency. Future research should empirically assess consumer interpretation across markets, extend the typology to other cognate terms (e.g., *reserva/reserve*), and integrate terminology mapping within territorial governance frameworks.

Conflito de interesses / Conflict of interest

O autor declara que não possui qualquer conflito de interesses financeiro, institucional ou pessoal relacionado com a pesquisa, a redação ou a publicação deste manuscrito. The author declares no financial, institutional or personal conflicts of interest related to the research, writing or publication of this manuscript.

Disponibilidade de dados / Data availability

Este estudo baseia-se exclusivamente em textos legais, documentos regulatórios, bases de dados públicas (como o registo eAmbrosia) e literatura acadêmica acessível publicamente, conforme listado nas referências. Nenhum conjunto de dados adicional foi gerado ou analisado pelo autor, de modo que não há dados suplementares a serem disponibilizados além das fontes públicas já citadas. The study relies solely on publicly available legal and policy documents, public databases and academic literature listed in the references, and no additional datasets were generated or analyzed by the author; therefore, there are no further data to be shared.

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Appendix A

The EU–Mercosur Wine Annex

This appendix summarizes the published text of the *EU–Mercosur Annex on Trade in Wine and Spirits*, as made available through the European Commission’s agreement materials and the publicly available annex text. The appendix is the sector-specific part of the agreement that governs trade in wine and spirits between the European Union and Mercosur. Its function is not to create a single wine law for both blocs, but to establish mutual rules that make cross-border trade more predictable while preserving each side’s domestic regulatory system.

According to the published annex text, the appendix applies to wine products and spirits falling under the relevant Harmonized System headings and asks the parties to make their best efforts to adopt wine definitions and oenological practices recommended and published by the International Organization of Vine and Wine (OIV). It further provides that wines produced in the other party are to be accepted for importation and sale when they comply with the exporting party’s product definitions and oenological practices that either conform to the relevant OIV standard or are specifically listed in the appendix to the annex.

The published annex text also sets out a notification and consultation mechanism for new or modified definitions and oenological practices listed in the appendix. If a party proposes a new definition or a modification, it must notify the other party in writing and include a technical dossier explaining the rationale. The other party may object within 90 days; if it objects, the parties are to consult with a view to reaching a mutually agreed solution within 60 days, unless that period is extended by mutual agreement. For the purposes of this paper, that procedure is significant because it shows how a domestically valid technical category such as *vinho nobre* may still require additional justification in a bilateral trade setting when it does not map neatly onto the other side’s categories.

On that basis, this appendix is best read as a source-based explanatory summary rather than as a verbatim reproduction. For this paper, its importance lies in showing that

EU–Mercosur trade law accommodates differences in domestic wine terminology through technical recognition and consultation procedures rather than through full harmonization. That institutional design helps explain why a territorially protected EU geographical indication such as *Vino nobile di Montepulciano* fits comfortably within the agreement’s GI logic, whereas a Brazilian technical category such as *vinho nobre* does not automatically receive equivalent treatment.

Appendix B

Brazil: Regulation of *Vinho nobre*

This appendix summarizes the published text of Brazil’s *Instrução Normativa n.º 14, de 23 de fevereiro de 2018*, which establishes the Complementação dos Padrões de Identidade e Qualidade do Vinho e Derivados da Uva e do Vinho. The regulation applies nationally to wine and grape-derived products commercialized in Brazil and forms part of the technical identity-and-quality framework administered by the Ministry of Agriculture. Within that framework, *vinho nobre* appears as a premium technical category rather than a territorial denomination. Brazil’s rule makes clear that the regulation is structured as a national product-standard instrument and not as a geographical-indication regime.

As reflected in the published text and the ministry’s explanatory material, the Brazilian framework treats *vinho nobre* as a category defined principally by measurable product characteristics, including the use of *Vitis vinifera* grapes and a higher natural alcoholic strength than ordinary fine wine. The ministry’s own explanation emphasizes that the category was introduced to accommodate wines whose natural alcohol content exceeds the range traditionally associated with *vinho fino*, owing to viticultural and production techniques developed in Brazil. In that sense, the category functions as a chemistry- and varietal-based quality classification backed by inspections and laboratory-verifiable parameters. In practical terms, this premium profile emerged in response to Brazilian viticultural innovation, including double pruning and winter harvest systems in cooler

highland areas and irrigated tropical viticulture in the São Francisco Valley, both of which made higher natural alcoholic strength commercially feasible.

For the purposes of this paper, the Brazilian text is best understood as a source-based summary of a national technical regulation. Its relevance lies in showing that *vinho nobre* is legally framed through analytical and compositional requirements, not through a protected territorial nexus. That makes it fundamentally different from the Italian GI model and helps explain why lexical similarity across Portuguese, Spanish, and Italian does not produce regulatory equivalence.

Appendix C

Spain: Regulation of *Vino noble*

This appendix summarizes the Spanish framework for traditional mentions as it applies to *vino noble*, with particular reference to Real Decreto 1363/2011, de 7 de octubre, which develops EU rules on the labelling, presentation and identification of certain wine products, and to Ley 6/2015, de 12 de mayo, on designations of origin and geographical indications of supra-regional scope (Ministerio de Medio Ambiente, y Medio Rural y Marino, 2011; España, Cortes Generales, 2015). Within that scheme, *vino noble* is treated as a traditional mention linked to ageing requirements rather than as an independent geographical indication. This framework should therefore be read as part of Spain's regulatory vocabulary for quality and maturation, not as a territorial denomination in itself. The official citation already listed in the paper's references points to the relevant BOE publication of the decree.

While earlier national annexes listed traditional mentions in detail, these functions are now effectively centralized at EU level: the eAmbrosia register (which replaced the E-Bacchus database) records 'Noble' as a protected traditional term for Spain and sets the official conditions of use.

In the Spanish framework, the term *noble* signals time and method of maturation. As used in the literature and reflected in the legal treatment discussed in this paper, the traditional mentions *vino noble*, *vino añejo* and *vino viejo* denote wines that have undergone minimum ageing periods of 18, 24 and 36 months, respectively, thereby conveying an expectation of additional cellar investment and stylistic development. The legal meaning is therefore process-based: it does not attach the term to one delimited place, but to compliance with an aging rule operating within broader wine-quality legislation. That is why, in comparative terms, the Spanish category differs both from Brazil's chemistry-based standard and from Italy's place-based GI.

The EU 'Traditional Term Details' sheet for Spain defines *noble* as wines aged for at least eighteen months in total in oak barrels of maximum 600 litres or in bottle, and, in a specific entry, as Málaga liqueur wines aged between two and three years.

In comparative terms, *vino noble* should be read alongside Spain's other traditional aging indications. Spanish legal references treat "noble," "añejo," and "viejo" as successive aging descriptors, with "noble" indicating the lowest aging threshold among the three, "añejo" requiring a longer maturation period, and "viejo" marking the most extended and oxidative style. This places *vino noble* firmly within Spain's aging-category logic and reinforces that it communicates maturation rather than origin.

For the purposes of this paper, the Spanish labelling framework is important because it anchors *vino noble* in an ageing-based legal category rather than in a protected name. This helps demonstrate the paper's central claim that lexical resemblance does not imply identical legal content: Spain's *vino noble* communicates maturation, not territorial origin, and therefore occupies a middle position between Brazil's technical standard and Italy's protected denomination.

Appendix D

Italy: Regulation of *Vino nobile di Montepulciano*

This appendix summarizes the published disciplinary framework for *Vino nobile di Montepulciano* DOCG as reflected in the *Gazzetta Ufficiale* publication of the consolidated disciplinary text and later official communications regarding amendments. Unlike the Brazilian and Spanish texts, the Italian framework is a denomination-specific regulatory instrument tied to a delimited territory, prescribed grape composition, aging periods, and certification controls. The relevant official materials state that the wine must be produced within the administrative territory of the Comune di Montepulciano and must meet the compositional and production rules established by the disciplinare.

The official text specifies, among other rules, a minimum proportion of Sangiovese (locally called *Prugnolo Gentile*), limits on complementary varieties, and a clearly delimited production zone within Montepulciano. Recent official amendments also confirm the growing role of additional geographical units such as the *Pievi*, reinforcing the denomination's territorial precision. In legal and economic terms, this structure turns the name into a collective territorial signal whose legitimacy depends on origin, production discipline, and certification, rather than on alcohol strength or general aging terminology alone.

For the purposes of this paper, the Italian disciplinary regime is the clearest example of a fully territorial wine classification. It is precisely this protected nexus between name, place, and regulated production that distinguishes *Vino nobile di Montepulciano* from both *vinho nobre* and *vino noble*. The appendix therefore reinforces the paper's core conclusion that the three cognate expressions belong to different legal families: technical standard, aging category, and protected geographical indication.

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