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1 AMENDMENTS TO REGULATIONS OF THE LIQUOR PRODUCTS ACT

The Minister of Agriculture, Forestry and Fisheries has recently approved and published amendments to the Regulations under the Liquor Products Act, 60 of 1989.

The updated Regulations can be downloaded [here](#).

Noteworthy amendments are:

1.1 Crystallised concentrated must

Use of concentrated must in crystal form now allowed. It is defined as "the solid uncaramelised product obtained by the crystallisation of liquid concentrated must without the use of solvents, and of which the specific gravity is at least 1.24 after dilution for use".

1.2 Oak maturation of premium husk spirit for more than 6 months

Now allowed, but the product must retain the distinctive character of premium husk spirit.

1.3 Wood maturation of gin

Allowed, on condition that the product retains the distinctive taste and aroma characteristic of gin and be clearly distinguishable from other classes of spirit.

1.4 Minimum sugar content of liqueur lowered

The minimum sugar content for liqueur now set at 75 g/l - previously 100 g/l.

1.5 Indication of class designation for certain newer classes of wine

Confirmed that it is compulsory to show the class designations for skin macerated white, extended barrel aged white/gris, natural pale/non-fortified pale, method ancestrale, alternative white/red and sun wine on labels. These must be indicated in the same field of vision as other mandatory items (alcohol content, sulphites statement, etcetera), and in letters with a vertical height of at least 2 mm (750ml container). The vast majority of producers show the compulsory information on back labels. Please note that the administering officer has the authority to allow exports without any of the compulsory particulars if not required in the country to be exported to.

In addition, depending on the pressure in the bottle, method ancestrale wine has to indicate whether it is a perlé wine or a sparkling wine.

1.6 Grape varieties allowed for wine production

"Grenache noir" added as a synonym for "Grenache".

"Listán blanc" and "Listón blanco" added as synonyms for "Palomino".

"Fumé blanc" listed as synonym for "Sauvignon blanc".

"Vermentino" added to the list.

1.7 New class of spirit-based liquor

Bitters added as a new class of spirit-based liquor:

Class	Manner of production and requirements	Alcohol content	
		Minimum %	Maximum %
1	2	3	
5. Bitter-tasting spirit-based drink / Bitters	The product shall have a predominantly bitter taste produced by adding flavourings of plant origin or nature-identical flavourings to a spirit.	15,0	*

1.8 A new, overhauled Table 6: Substances which may be added to liquor products

A project between Government (Agriculture in consultation with Health) and Industry, taking new technologies, trends, safety, the interests of the public at large and international standards into account.

2 AMENDMENT TO NOTICE REGARDING THE USE OF TEQUILA

To entrench Government's view in this regard, the Government Notice concerned was amended to prohibit the use of "tequila" on liquor products unless such use is in compliance with the official Mexican standard.

3 AMENDMENTS TO HEALTH WARNING REGULATIONS

The Minister of Health has published amendments to above-mentioned, to come into effect on **22 December 2020**. These entail:

- a) A health warning must be one eighth of the total size of the container (not label). "Container" is now defined to include "any package, box, bottle, can or packet, in which an alcoholic beverage is sold or offered for sale". Thus, outer packaging will also be affected.
- b) All 7 warnings must be rotated with equal regularity, on each product line, within a 36 month cycle.

Industry is still in consultation with Government regarding these new requirements and has suggested that producers should not change labelling before that process is completed. We shall keep you updated.

4 USE OF SULPHURIC ACID AND IMPORTED CONCENTRATED MUST

The addition of **sulphuric acid** directly to wine (or grapes or must) is not allowed. Neither here nor in other wine making countries. Sulphuric acid is a highly corrosive chemical that is potentially explosive in concentrated form. It can cause severe skin burns, can irritate the nose and throat and cause difficulties breathing if inhaled, can burn the eyes and possibly cause blindness, and can burn holes in the stomach if swallowed. It can be used in a diluted form with cation exchange resins under the strict conditions set out in Table 7 of the Regulations.

There seems to be some uncertainty as to the use of **imported concentrated must** in making wine. It can be used, but the normal limitations in respect of volume added and increase in total alcohol content

apply. The authorities, however, have indicated that the origin of imported concentrated must should be indicated on labels and due process in this regard will soon kick off.

5 INTERNATIONAL DEVELOPMENTS

It is clear that **nutritional and ingredient labelling** for all alcoholic beverages will become compulsory in the European Union in the not too distant future. Either by way of legislation or by way of self-regulation. [This](#) article gives some background in this regard.

The **Irish Public Health (Alcohol) Bill** will certainly impact your business with that country when finally passed. It is currently in their Parliamentary process and is awaiting responses from the EU Commission and EU Member States. The Bill requires:

- (i) a warning that is intended to inform the public of the danger of alcohol consumption,
- (ii) a warning that is intended to inform the public of the danger of alcohol consumption when pregnant,
- (iii) a warning that is intended to inform the public of the direct link between alcohol and fatal cancers,
- (iv) the quantity in grams of alcohol contained in the container concerned,
- (v) the energy value expressed in kilojoules and kilocalories contained in the container concerned, and
- (vi) details of a website, to be established and maintained by the Executive, providing public health information in relation to alcohol consumption.

It also provides that at least one third of printed materials (i.e. the label, packaging etcetera) has to be given over to the health warnings.



ANDRÉ MATTHEE

DIRECTOR: REGULATORY SERVICES

WINE AND SPIRIT BOARD

Tel: 022 423 8692 **Fax:** 086 559 0446 **Email:** matthee@wo.org.za

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