| **Article of EU 2019/787** | **Issue** | **Detail** | **Difference from EC 110/2008** |
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| Article 5 | Definition of ethyl alcohol of agricultural origin. | This provision provides the definition and requirements for ethyl alcohol of agricultural origin including the specification of the maximum residue limits for a range of organic compounds arising from technical composition analysis. | The new definition updates the maximum levels of certain residues to be in line with the technical parameters currently used by the industry and by most laboratories of analysis. |
| Article 6(2) | Dilution and dissolution of colourants, flavourings and other authorised additives  | This provision changes the requirement so that the amount of ethyl alcohol of agricultural origin, distillate of agricultural origin or certain spirit drinks should only be used in an amount strictly necessary for the purposes of dilution or dissolution. | Expands existing provisions in Article 3(3) of the EC 110/2008 |
| Article 7(2) | General requirements relating to the production, content and sweetening of certain spirit drinks  | Requires that the spirit drink should not contain adjuncts other than whole unprocessed items of the raw material from which the alcohol is obtained, and which are mainly used for decorative purposes | Adds to the requirements outlined in Article 5(1) of EC 110/2008 |
| Article 10(5)(b) | Restriction on the supplementation or replacement of a sales denomination | Derogation to allow for replacing a legal name with a compound term which includes the term ‘liqueur’ or ‘cream’, provided the final product complies with the requirements of category 33 of Annex I (**Liqueur).** | Derogation allowing for the supplementation or replacement of a legal name with a GI. |
| Article 10(6):  | Requirements relating to the supplementation of legal names | Provided certain specific rules are complied with, the legal name for a spirit drink may be supplemented by:* A ‘customary name’ defined as a name which is accepted as the name of the food by consumers in the Member State in which that food is sold, without that name needing further explanation.
* in addition to the term ’mixed spirit drink’, ‘mixture’ or ‘mixed’ may be used to supplement a legal name whereas previously only ’mixed spirit drink’ was an option.
* with the exception of whisky, the term ‘dry’ or ‘*dry’* may be used to supplement spirit drinks provided they have not been sweetened in any way. A derogation from this is for spirit drinks that fit the category for liqueurs and have therefore been sweetened. Gins, Distilled Gins and London Gins have their own specific requirements for the use of this supplementary term.
 | This Article consolidates a number of provisions from EC110/2008.  |
| Article 11(2):  | Prohibition on terms used in compound terms | The following terms are new prohibitions on what can be used in a compound term describing an alcoholic beverage:* ‘alcohol’
* ‘spirit’
* ‘drink’
* ‘spirit drink’
* ‘water’.
 | New requirement |
| Article 11(3) | Labelling requirements for compound terms | Adds new specifications for how a compound term must appear in the labelling or presentation of an alcoholic beverage. The compound term must:* appear in uniform characters of the same font, size and colour;
* not be interrupted by any textual or pictorial element which does not form part of them;
* not appear in a font size which is larger than the font size used for the name of the alcoholic beverage.
* in cases where the alcoholic beverage is a spirit drink, always be accompanied by the legal name of the spirit drink, which shall appear in the same visual field as the compound term, unless the legal name is replaced by a compound term that includes the term ‘liqueur’ or ‘cream’, provided that the final product complies with the requirements of category 33 of Annex I
 | New requirement |
| Article 12(4)(a), (b) & (c) | Labelling requirements for using an allusion to a sprit drink | There are new labelling requirements for the use of allusions to spirit drinks in the description of alcoholic beverages, stating that the allusions must:* not be on the same line as the name of the alcoholic beverage;
* appear in a font size which is no larger than half the font size used for the name of the alcoholic beverage and, where compound terms are used, in a font size which is no larger than half the font size used for such compound terms.
* appear in the same visual field as the legal name of the spirit drink
 | New requirement. |
| Article 13(3) | Mixtures  | EU 2019/787 adds the terms ‘mixture’ and ‘mixed’ (to “mixed spirit drink”) with regards to labelling requirements. The requirements for font style size and colour have been extended to include the list of alcoholic ingredients as well as the accompanying term in all spirit drinks. The font should be of uniform characters in the same colour and style, and of a size no larger than half that used for the legal name of the spirit drink. | Article 11 of EC 110/2018 on labelling mixtures refers to term “mixed spirit drink” and only specified font requirements for that term. |
| Article 13(3a) | Labelling requirements for blends | New requirements for the presentation and labelling of blends of spirit drinks of different GIs, or blends of non-GI spirit drinks with a GI. * the legal names provided for in the categories set out in Annex I or GIs may be indicated only in a list of the alcoholic ingredients appearing in the same visual field as the legal name of the spirit drink.
* the list of alcoholic ingredients shall be accompanied by the term ‘blend’, ’blending’ or ‘blended’.
* the list of alcoholic ingredients and the accompanying term shall appear in the same visual field as the legal name of the spirit drink, in uniform characters of the same font and colour and in a font size which is no larger than half the font size used for the legal name.
* the proportion of each alcoholic ingredient in the list of alcoholic ingredients shall be expressed at least once as a percentage, in descending order of quantities used.
* the proportion shall be equal to the percentage by volume of pure alcohol it represents in the total pure alcohol content by volume of the mixture.
 | New requirement. |
| Article 13(4), 13(4)(a) & (b) | Mixtures | By way of a derogation, in the case of a mixture which meets the requirements set out in one of the categories in Annex I, the mixture must use the legal name for that category. In such a case the legal names or GIs for the spirit drinks that appear in the mixture may only appear in a list of all the alcoholic ingredients contained in the mixture which:* shall appear in uniform characters of the same font and colour and in a font size which is no larger than half the font size used for the legal name;
* is in the same visual field as the legal name of the mixture at least once.
 | The differences in EU 2019/787 are in addition to the provision of Article 11(5) of EC 110/2008, which is carried over to EU 2019/787. Article 11(5) states that the proportion of each alcoholic ingredient in the list must be expressed at least once as a percentage, in descending order of quantities used. That proportion must be equal to the percentage by volume of pure alcohol it represents in the total pure alcohol content by volume of the mixture. |
| Article 13(5) | Using the names of the raw plant materials in presentation and labelling | The use of a name of a raw plant material in the legal name of a spirit drink does not prevent it being used to present or label other foodstuffs. The names of such raw plant materials may be used to describe, present or label other spirit drinks as long as the usage does not mislead the consumer. |  |
| Article 14(1)  | Indication of a place of provenance | If a place of provenance, other than a GI, is used in the presentation, label or description of a spirit drink, it shall correspond to the place or region where the stage in the production process which conferred on the finished spirit drink its character and essential definitive qualities took place. | New requirement. |

Further explanation regarding labelling differences between EC 110/2008 and EU 2019/787 can be found at:

<https://www.gov.uk/guidance/labelling-spirit-drinks>